



Addendum 2 to Mitigated Negative Declaration

Leon Housing Mobile Home Park

East Coachella Valley Water Supply Project
Valley View Mobile Home Park Water
Consolidation Project

State Clearinghouse #2019079095

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Acronyms

Acronym	Definition
APE	area of potential effect
APN	assessor parcel number
AQMP	Air Quality Management Plan
BMPs	best management practices
CalEEMod	California Emissions Estimator Model
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CVAG	Coachella Valley Association of Governments
CVMSHCP	Coachella Valley Multiple Species Habitat Conservation Plan and Natural Community Conservation Plan
CVWD	Coachella Valley Water District
CWSRF	Clean Water State Revolving Fund
DAC	disadvantaged community
DEH	Riverside County Department of Environmental Health
DTSC	California Department of Toxic Substances Control
DWR	California Department of Water Resources
FCWCD	Riverside County Flood Control and Water Conservation District
FEMA	Federal Emergency Management Agency
gpm	gallons per minute
HACR	Housing Authority of the County of Riverside
MCL	maximum contaminant level
MHI	median household income
MHP	mobile home park
MND	Mitigated Negative Declaration
NPDES	National Pollutant Discharge Elimination System
O&M	operations and maintenance
PVC	polyvinyl chloride
RCIT	Riverside County Information Technology
RWQCB	Regional Water Quality Control Board

SAA	Lake and Streambed Alteration Agreement
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCH	State Clearinghouse
SDAC	Severely Disadvantaged Community
SSAB	Salton Sea Air Basin
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
SWS	small water system
USACE	United States Army Corps of Engineers
USDA	United States Department of Agriculture
US EPA	United States Environmental Protection Agency

1. INTRODUCTION

This document is the second Addendum to the Valley View Mobile Home Park (MHP) Water Consolidation Project Mitigated Negative Declaration (MND), Subsequent MND, and Addendum 1 to the MND (State Clearinghouse [SCH] No. 2019079095; collectively referred to hereafter as the “MND”). The second Addendum to the MND has been prepared pursuant to the California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq.

1.1 Project Background

On September 24, 2019, the Coachella Valley Water District (CVWD) Board of Directors approved the Valley View MHP MND, which evaluated the environmental impacts associated with connecting nine small water systems (SWSs) to CVWD’s potable water system through the installation of potable water pipelines to address public health concerns. On April 12, 2022, the CVWD Board of Directors approved the Subsequent MND, which evaluated the environmental impacts associated with construction of a new potable water pipeline (the Phase III A-2 pipeline) that would connect the existing CVWD water main crossing the Coachella Valley Stormwater Channel on Palm Street to the Airport Boulevard pipeline evaluated in the MND. In July 2023, the CVWD Board of Directors approved Addendum 1 to the MND, which evaluated the environmental impacts of a revised pipeline alignment to one of the nine SWSs, De Leon Ranch, that was identified in May 2021 during the engineering design process for the Valley View MHP Water Consolidation Process.

In August 2022, through the engineering design process for the Valley View MHP Water Consolidation Project, CVWD also determined the need to extend CVWD potable water services to four additional SWSs to address potable water public health concerns. A second Addendum to the MND has been identified as the appropriate CEQA document to address the revised pipeline alignment (see Section 1.3, below).

The four SWSs would be consolidated into the CVWD potable water system through the installation of potable water transmission pipelines in the same roadways as sewer pipelines evaluated in the 2021 Airport Boulevard Sewer Consolidation Project MND (SCH #2021090585) (see **Figure 1-3**), with the exception of an additional approximately 3,000 linear feet of potable water transmission pipeline in Avenue 57. The Airport Boulevard Sewer Consolidation Project will connect 13 SWSs to the CVWD sanitary sewer system to address public health concerns in local disadvantaged communities associated with inadequate, failing, or aging SWSs. The Airport Boulevard Sewer Consolidation Project MND was adopted by the CVWD Board of Directors on December 7, 2021. Given the similarities between CVWD’s sanitation and domestic water pipeline locations, the analysis in this second Addendum to the MND occasionally makes reference to the findings of the 2021 Airport Boulevard Sewer Consolidation Project MND.

1.1.1 Approved Project

The MND, Subsequent MND, and Addendum 1 to the MND analyzed the environmental impacts of construction and operation of approximately 14,800 linear feet of new water mains, 1,100 linear feet of water laterals, 2,300 linear feet of fire service lines, and 1,500 linear feet of onsite service lines at nine SWS to add 143 connections to CVWD's existing potable water system (Approved Project). The water alignment would be placed within the public right-of-way along Airport Boulevard, Avenue 66, Desert Cactus Drive and Soto Street (see **Figure 1-1**).

1.1.2 Proposed Modified Project

In August 2022, through the engineering design process for the Valley View MHP Water Consolidation Project, CVWD identified four additional SWSs that could benefit from improved reliability, safety, and security of the SWS water supply because of their proximity to the nine Valley View SWSs and presumably similar water quality problems. The Modified Project, also referred to as the Leon Housing MHP Consolidation Project, would construct approximately 7,400 linear feet of new 12-inch potable water mains within Fillmore Street and Avenue 57, 80 linear feet of laterals, and various onsite service lines, to add 38 connections within four SWSs to CVWD's existing potable water system: Duran's Farms (Assessor Parcel Number [APN]: 757-110-020), Leon Housing (APN: 757-110-025), Oscar Cruz Water System (APN: 757-140-009), and Villas de Josue MHP (APN: 757-110-023). **Figure 1-2** shows the Approved Project and the proposed modifications to the Approved Project (Modified Project).

1.2 Purpose of Addendum

Addendum 2 to the MND addresses potential environmental effects of the construction and operation of the Modified Project as shown in **Figure 1-2** (and discussed in greater detail in Section 2). The MND and this Addendum, together with the other documents incorporated by reference herein, serve as the environmental review of the Leon Housing MHP Consolidation Project (Modified Project), as required pursuant to the provisions of CEQA, the CEQA Guidelines, 14 California Code of Regulations Section 15000 et seq. The environmental analysis in this Addendum and all feasible mitigation measures identified in the MND would be incorporated into the resolutions approving the Modified Project.

Figure 1-1: Approved Project Evaluated in MND

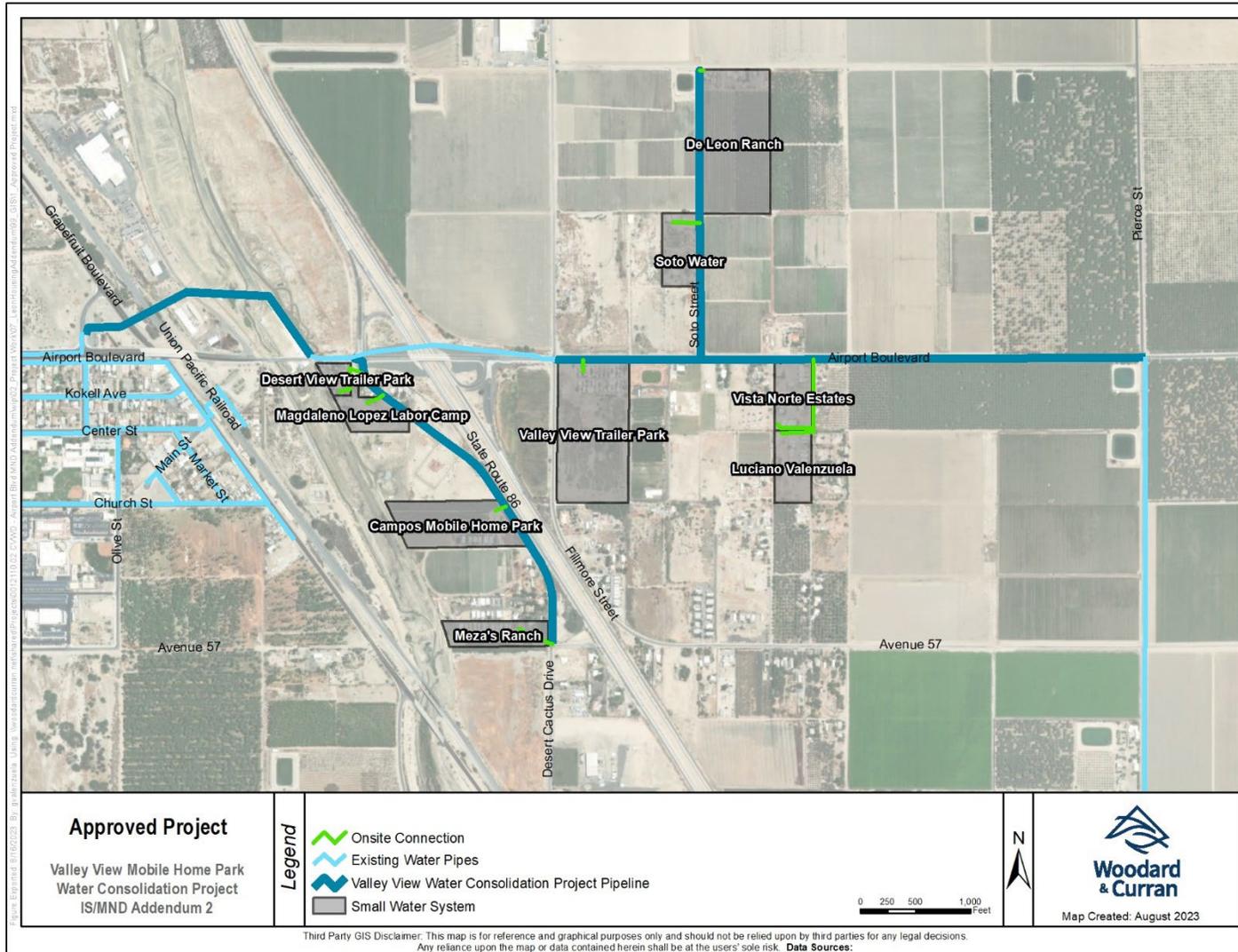


Figure 1-2: Modified Project and Valley View MHP Water Consolidation Project

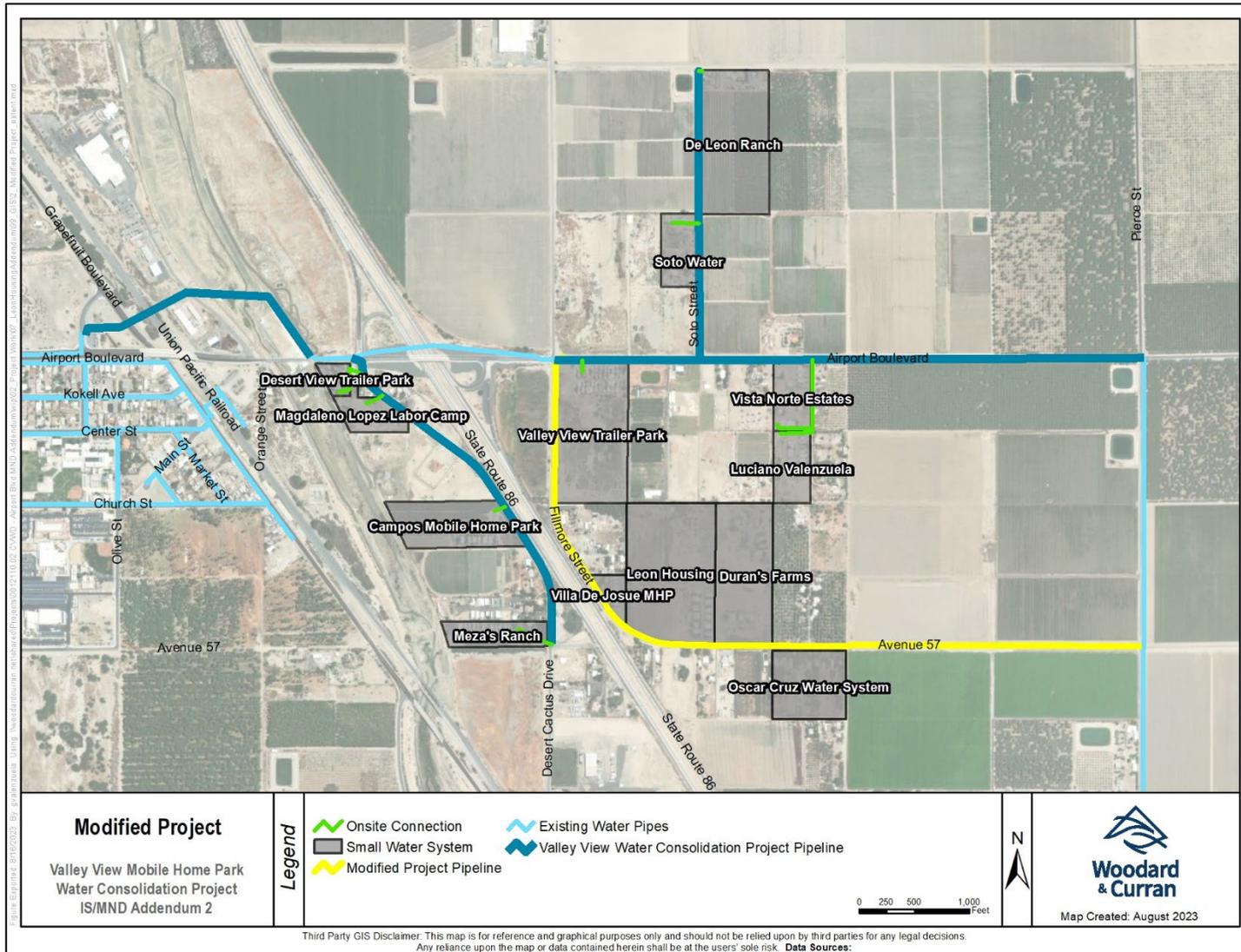
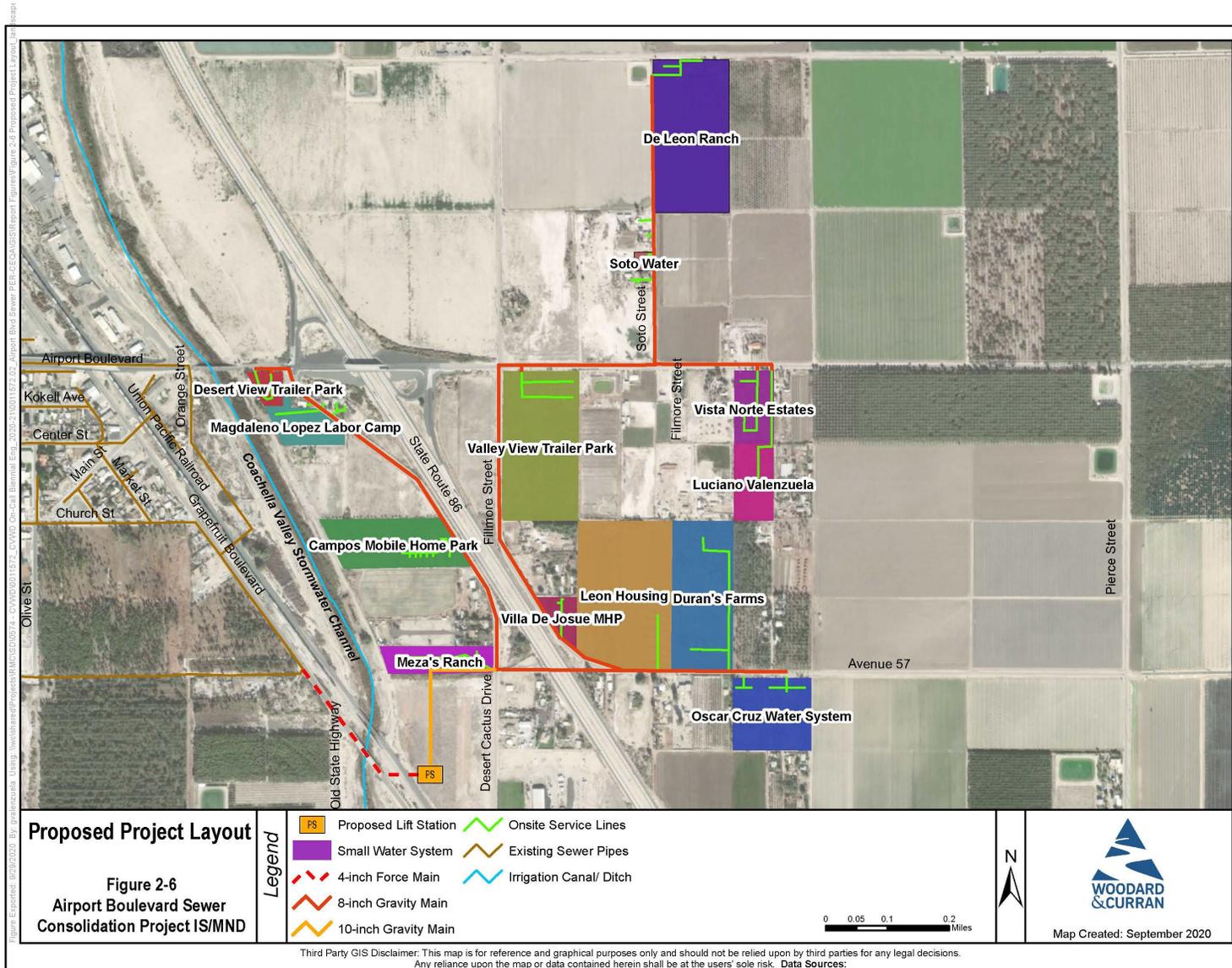


Figure 1-3: Airport Boulevard Sewer Consolidation Project



1.3 Basis for Addendum

Section 15164 of the CEQA Guidelines states: “The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR have occurred.” Pursuant to Section 15162 of the CEQA Guidelines, no subsequent EIR may be required for the project unless the lead agency determines, on the basis of substantial evidence, that one or more of the following conditions are met:

- A. When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
 - (1) Substantial changes are proposed in the project which would require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
 - (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which would require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
 - (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - (a) The project would have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (b) Significant effects previously examined would be substantially more severe than shown in the previous EIR;
 - (c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - (d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

- B. If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision a). Otherwise the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.
- C. Once a project has been approved, the lead agency's role in project approval is completed, unless further discretionary approval on that project is required. Information appearing after an approval does not require reopening of that approval. If after the project is approved, any of the conditions described in subdivision a) occurs, a subsequent EIR or negative declaration shall only be prepared by the public agency which grants the next discretionary approval for the project, if any. In this situation no other responsible agency shall grant an approval for the project until the subsequent EIR has been certified or subsequent negative declaration adopted.

CVWD has assessed the Modified Project modifications in light of the requirements defined under Section 15162 of the CEQA Guidelines. As discussed in this Addendum, none of the conditions requiring preparation of a subsequent negative declaration under Section 15162 of the CEQA Guidelines are identified.

1.4 Evaluation of Environmental Impacts

This Addendum uses Environmental Checklist questions, pursuant to Section 15063(d)(3) of the CEQA Guidelines, to compare the anticipated environmental effects of the proposed Modified Project with those disclosed in the MND for the Approved Project. The Addendum reviews whether any of the conditions requiring preparation of a Subsequent MND pursuant to Section 15162 of the CEQA Guidelines are met, and whether there are new significant impacts resulting from the proposed Modified Project. The Environmental Checklist questions are used to review the potential environmental effects of the proposed Modified Project for each of the following resource areas:

- Aesthetics;
- Agriculture Resources;
- Air Quality;
- Biological Resources;
- Cultural Resources;
- Geology and Soils;
- Greenhouse Gas Emissions;
- Energy;
- Hazards and Hazardous Materials;
- Hydrology and Water Quality;
- Land Use and Planning;
- Mineral Resources;
- Noise;
- Population and Housing;
- Public Services;

- Recreation;
- Transportation and Traffic;
- Tribal Cultural Resources;
- Utilities and Service Systems; and
- Wildfire Risk.

The Modified Project would involve an extension of the previously approved potable water pipelines serving nine SWSs, collectively referred to as the Valley View MHP water consolidation project. The new extension would be in a similar location and setting, within existing roads. The methods of construction (i.e., pavement cutting, grading, trenching, and restoration) are the same as, or very similar to, those evaluated in the MND. Based on the similarities in construction methods and location of the Approved Project and the Modified Project, the environmental analysis provided in the MND remains current and applicable to the Modified Project. Additional studies (Rincon Consultants 2024a and 2024b) were conducted to evaluate historical and biological resources in the Modified Project area. The conclusions and mitigation measures in the MND are applicable to the Modified Project. As explained below, the Modified Project is not associated with new significant impacts or greater severity of impacts compared to the Approved Project.

The following resource areas were found to have No Impact or Less than Significant Impact in the MND, and the Modified Project would also result in a finding of No Impact or Less than Significant Impact. No additional analyses are required for the following unchanged environmental resources evaluated in the MND. For a discussion and analysis of the resources topics below, please refer to the previous MND and Subsequent MND, as these resource areas are not analyzed further in this Addendum:

- 3.1 Aesthetics
 - a) *adverse effect on scenic vista*
 - b) *damage scenic resources within the viewshed of a State scenic highway*
 - c) *degrade existing visual character or quality of public views*
 - d) *create a new source of substantial light or glare*
- 3.2 Agriculture and Forestry Resources
 - a) *conflict with existing zoning for, or cause rezoning of forest land or timberland*
 - b) *loss of or conversion of forest land*
 - c) *result in conversion of farmland or forest land*
- 3.3 Air Quality
 - d) *result in other emissions, such as odors, that may affect a substantial number of people*
- 3.6 Energy
 - a) *wasteful, inefficient, or unnecessary consumption of energy resources*
 - b) *conflict with or obstruct a plan for renewable energy or energy efficiency*
- 3.7 Geology and Soils
 - a) *substantial adverse effects involving earthquake fault rupture, seismic-related ground shaking or ground failure, or landslides;*

- b) *soil erosion or loss of top soil*
 - c) *unstable soil*
 - d) *expansive soil*
 - e) *soil incapable of supporting septic tanks*
 - f) *destroy a unique paleontological resource or site, or unique geological feature*
- 3.8 Greenhouse Gas Emissions
- a) *generate significant greenhouse gas emissions*
 - b) *conflict with a greenhouse gas reduction plan*
- 3.9 Hazards and Hazardous Materials
- a) *routine transport, use, or disposal of hazardous materials*
 - c) *hazardous emissions, materials, substances, or waste within one-quarter mile of a school*
 - e) *within two miles of a public airport or public use airport result in a safety hazard or excessive noise*
 - g) *expose people or structures to a significant risk of loss, injury or death involving wildland fires*
- 3.10 Hydrology and Water Quality
- b) *substantially decrease groundwater supplies or interfere substantially with groundwater recharge*
 - c) *substantially alter the existing drainage pattern of the site or area*
 - e) *conflict with implementation of a water quality control plan or sustainable groundwater management plan*
- 3.11 Land Use and Planning
- a) *physically divide an established community*
- 3.12 Mineral Resources
- a) *loss of a known, valuable mineral resource*
 - b) *loss of a delineated mineral resource recovery site*
- 3.13 Noise
- c) *within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels*
- 3.14 Population and Housing
- a) *induce substantial unplanned growth*
 - b) *necessitate construction of replacement housing*
- 3.15 Public Services
- a) *construction of new or physically altered government facilities*
- 3.16 Recreation
- a) *increased use of park and recreational facilities*
 - b) *construction or expansion of recreation facilities*
- 3.17 Transportation
- b) *conflict with CEQA Guidelines Section 15064.3, subdivision (b)*

- c) substantially increase hazards due to a geometric design feature or incompatible uses*
- 3.19 Utilities and Service Systems
 - a) construction of water, wastewater treatment, storm water, electric power, natural gas, telecommunications or other utilities*
 - b) have sufficient water supplies*
 - c) adequate wastewater treatment capacity*
 - d) generate excess solid waste or impair attainment of solid waste reduction goals*
 - e) comply with solid waste reduction regulations*
- 3.20 Wildfire
 - b) exacerbate wildfire risk*
 - c) require infrastructure that may exacerbate fire risk*
 - d) expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes*

This Addendum evaluates environmental resources where the proposed Modified Project changes could result in changes to impacts and environmental resources that were potentially significantly impacted by the Approved Project and required mitigation as disclosed in the MND. Because of the Modified Project's similarity to the Approved Project in location and construction methods, there is the potential for the Modified Project to have similar impacts as the Approved Project.

In addition, this document includes analysis to support compliance with federal environmental review requirements should CVWD pursue federal funding programs. The federal cross-cutting topics evaluated include:

- Federal Endangered Species Act
- National Historic Preservation Act
- Archaeological and Historic Preservation Act
- Clean Air Act
- Coastal Zone Management Act
- Farmland Protection Policy Act
- Executive Order 11988 – Floodplain Management, as amended by Executive Orders 12148 and 13690
- Federal Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, and Executive Order 13168
- Fish and Wildlife Coordination Act
- Executive Order 11990 – Protection of Wetlands
- Executive Order 13112 – Invasive Species
- Wild and Scenic Rivers Act
- Safe Drinking Water Act, Sole Source Aquifer Program
- Executive Order 13195 – Trails for America in the 21st Century

- Executive Order 13007 – Indian Sacred Sites
- Magnuson-Stevens Fishery Conservation and Management Act
- Rivers and Harbors Act, Section 10
- Wilderness Act
- Environmental Justice
- Alternatives

Impact Terminology

The responses to each of the Environmental Checklist questions addressed in this Addendum use CEQA terminology as specified below:

Reduced Impact. The impacts of the Modified Project would be less than those of the Approved Project.

No New Impact/No Impact. The Modified Project would result in no or no new impact compared to the Approved Project.

New Mitigation Required. The Modified Project would result in a new or substantially greater impact compared to the Approved Project and new mitigation would be required to reduce the impact to a less than significant level.

New Potentially Significant Impact. The Modified Project would result in a new impact or substantially greater impact compared to the Approved Project. A subsequent MND would be required.

1.5 Summary of Findings

The environmental evaluation in Addendum 2 has concluded that major revisions of the MND due to new significant environmental effects or a substantial increase in the severity of previously identified significant effects are not required. There are no substantial changes proposed in the Modified Project; no substantial changes in the circumstances under which the Modified Project would be undertaken; and no new information of substantial importance which was unknown or could not have been known at the time the MND was certified. The impacts of the Modified Project are consistent with the impacts of the Approved Project. There are no new significant impacts resulting from implementation of the Modified Project, nor are there any substantial increases in the severity of any previously identified environmental impacts, and no new mitigation measures would be required. The environmental analysis in this Addendum and all applicable mitigation measures identified in the MND would be incorporated into the resolutions approving the Modified Project.

2. PROJECT DESCRIPTION

2.1 Purpose of Project

The Modified Project is part of the Valley View MHP Water Consolidation Project in the East Coachella Valley area which is necessary to address potable water public health concerns in local disadvantaged communities (DACs). The water consolidation project would create water reliability, redundancy, and functionality for potable water for the identified SWSs to ensure adequate public health throughout the area. The CVWD potable water system is operated and maintained by full-time State of California certified operational staff.

The objectives of the Modified Project are the same as the original Valley View MHP Water Consolidation Project and are twofold:

1. To improve the reliability, safety, and security of the water supply for rural DACs within the CVWD service area that are not currently connected to the CVWD potable water system; and
2. To implement a cost-effective, technically feasible, long-term water supply solution for the drinking water quality deficiencies identified in the existing small water systems within the CVWD service area.

2.2 Environmental Setting

The Modified Project is located in the eastern portion of the greater Coachella Valley within Riverside County, California near the community of Thermal, in the vicinity of the intersection of State Route 86 and Airport Boulevard. The project area is south of Avenue 55, west of Pierce Street, north of Avenue 58, and east of State Route 86.

The eastern portion of the Coachella Valley is located at the northern end of the Salton Sea, California's largest lake. Physically, the eastern Coachella Valley is bounded by the Santa Rosa Mountains to the west, and the Mecca Hills and the edge of Joshua Tree National Park to the northeast. The project area is located in the Coachella Valley region of the Salton Sea Air Basin, and it is located in the Whitewater River Watershed. The area encompasses rural desert communities and agricultural production.

The community of Thermal is located west of State Route 111, south of the City of Coachella, and contains light industrial uses as well as residential and commercial uses. The Riverside County-owned Jacqueline Cochran Regional Airport is located in the western part of Thermal. Historically, Thermal has been an important agricultural center, and remains so, with its more prominent crops including dates, table grapes, grapefruit, and assorted vegetables. In the core area of the community, to the north of Thermal Town Center, are two schools – John Kelley Elementary School and La Familia Continuation High School, a Riverside County Sheriff's station, and Riverside County Thermal Fire Station 39. State Route 111 and State Route 86 are the main north-south connector

routes within the eastern Coachella Valley. The Southern Pacific Railroad runs adjacent to State Route 111 and the Salton Sea, to Riverside County's southern boundary.

The Coachella Valley Multiple Species Habitat Conservation Plan and Natural Community Conservation Plan (CVMSHCP) is a comprehensive multiple species habitat conservation planning program that addresses multiple species needs, including habitat and the preservation of natural communities in the Coachella Valley area of Riverside County. The Modified Project is not located within or adjacent to a conservation area associated with the CVMSHCP. The CVMSHCP was adopted by the plan participants in 2007 and 2008, and permits were issued by the wildlife agencies in late 2008.

Future projects within the vicinity of the Modified Project include the following:

- The Airport Boulevard Sewer Consolidation Project consists of consolidation of 13 privately owned small water systems, currently reliant on private septic systems. The project would connect to CVWD's sanitary sewer system and convey an average of approximately 64,000 gallons per day. The project would construct approximately 17,700 linear feet of new sewer mains, a lift station, sewer laterals, and approximately 12,150 linear feet of onsite service lines. The project is in the planning stage and has an undetermined construction start date.
- The Coachella Valley Association of Governments (CVAG) CV Link project would provide access for pedestrians, bicyclists, and golf carts on a dedicated off-road path parallel to Highway 111. A segment of the multi-modal path would be constructed between Avenue 54 and Airport Boulevard along the west bank of the Coachella Valley Stormwater Channel. This segment is currently under construction.
- Riverside County's Airport Boulevard Bridge Replacement Project would widen Airport Boulevard overpass crossing of the Coachella Valley Stormwater Channel. This project currently has an undetermined construction start date.
- The Coachella Airport Business Park Project would develop parcels designated Industrial District between the Coachella Valley Stormwater Channel and Highway 86, immediately north of Airport Boulevard. The project, a mixed-use business park development which includes warehouse space, commercial cannabis-related uses, small businesses, self- and vehicle-storage, a drive thru restaurant and service station/mini mart-related land uses, and an electric substation, has been approved by the City of Coachella (SCH# 2023040106) and is currently planned to be constructed in phases through 2025.
- The City of Coachella plans to construct a potable water pipeline north of Airport Boulevard, east of Highway 111, and west of Highway 86, in adjacent easements within the vicinity of the Phase III A-2 Transmission Main, in order to extend the City's potable water service capabilities easterly. No timeline for construction or planning is available as of the writing of this document.

2.3 Existing and Proposed SWS Facilities

The Modified Project would consolidate four privately owned SWSs into the CVWD potable water system: Villas De Josue MHP, Leon Housing, Duran’s Farms, and Oscar Cruz Water System. Detailed descriptions of the existing facilities, conditions, and water quality for each SWS are provided below. The existing potable water supply for the four SWSs consists of local groundwater supplied by privately-owned groundwater wells. The SWSs do not have access to surface water or municipal water supplies; there are no alternate potable water sources available in the event that the operation of the potable wells is interrupted.

The SWSs are currently operated by the system owners and regulated by the Riverside County Department of Environmental Health (DEH). The local groundwater supplies of the SWSs have shown elevated concentrations of arsenic, fluoride and other constituents that are currently regulated by the State or may be in the near future (e.g., hexavalent chromium).

Existing site conditions were evaluated during site visits on March 29 and May 10, 2023 by utility advisors with Moonshot Missions on behalf of the United States Environmental Protection Agency (US EPA) for the purpose of extending water service to a large number of neighboring SWSs near the CVWD service area.

2.3.1 Villas De Josue Mobile Home Park

Existing Conditions

The Villas De Josue MHP SWS relies on a single well to serve domestic water and fire protection to a total of nine mobile homes. Well information is provided in **Table 2-1**. The water source for this system is a 6-inch diameter, 550-foot deep well with a 5-horsepower (hp) immersible pump. The well casing is polyvinyl chloride (PVC). The well pumps into a 1,500-gallon pressure tank then out to the distribution system consisting of PVC piping of unknown diameter. The SWS also has a fire suppression system, which includes a 15,500-gallon storage tank, a booster pump, a bladder tank and one fire hydrant. A reduced pressure backflow prevention device isolates the fire system from the domestic system. An overview of the SWS is shown in **Figure 2-1**.

Table 2-1: Villas De Josue MHP Well Information

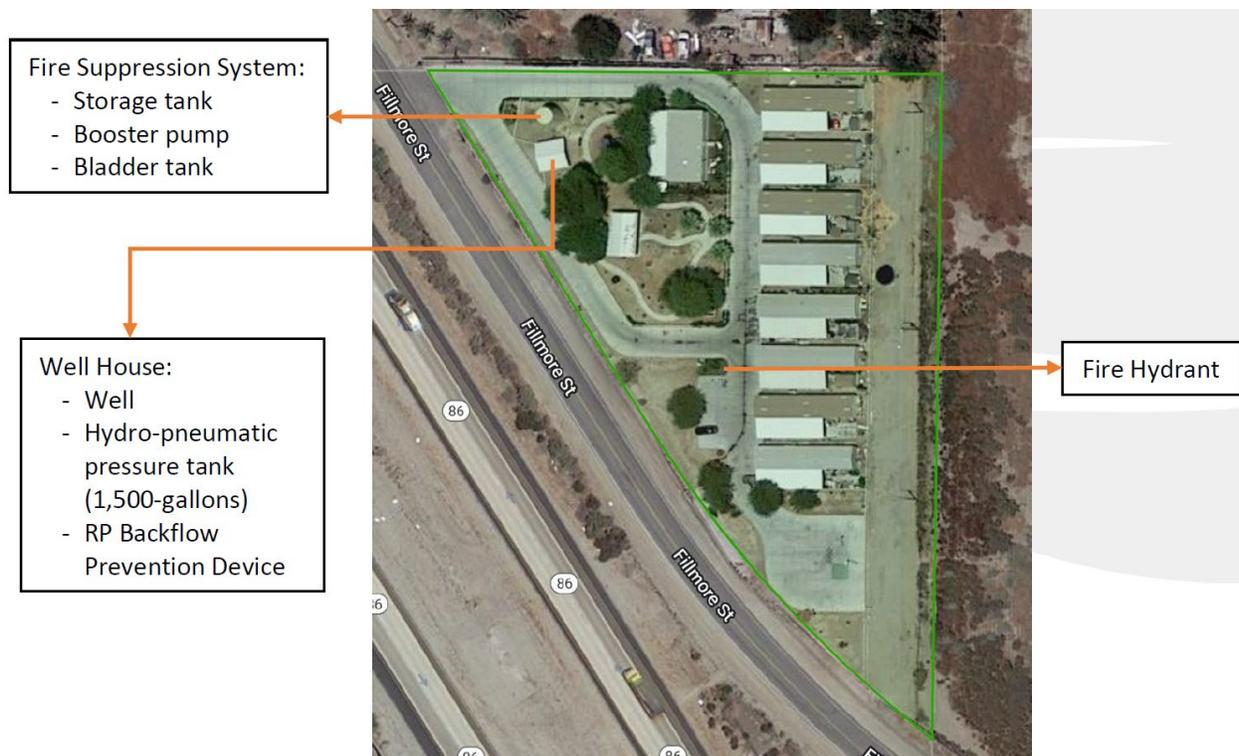
Installation Date	Water Level	Well Depth	Casing Diameter	Casing Type	Pump Motor Type	Pumping Capacity
2013	Unknown	550 ft	6-inch	Unknown	Immersible	5-hp

Villas De Josue is owned and operated by the Housing Authority of the County of Riverside (HACR). According to HACR, the well pump was installed in 2013 and may be approaching its expected lifespan. While it is recommended to plan for the well pump’s replacement as a contingency, the pump may still have some remaining life. During an

assessment conducted in March 2023 by Moonshot Missions, the well appeared to be in good working condition. The 1,500-gallon pressure tank was installed in 2013 and was observed to be in good condition. Access to the well, the pressure tank and the associated equipment was restricted (i.e., in a locked well house). The fire suppression system was also installed in 2013, was secured by fencing, and appeared to be in good working condition during the March 2023 assessment. The condition and age of the distribution piping was unknown. A system diagram of the distribution piping was unavailable.

In July 2022, the water system was tested for inorganic chemicals, iron, manganese, chloride, and Total Dissolved Solids. All results were within acceptable State and Federal Safe Drinking Water Act standards.

Figure 2-1: Villas De Josue MHP Existing Facilities



Source: Moonshot Missions Villas De Josue MHP Water System Needs Assessment

Modified Project

The Modified Project would connect Villas De Josue MHP to CVWD’s potable water system via the proposed 12-inch water main on Fillmore Street. The consolidation would be a master meter connection wherein HACR would retain responsibility of maintaining the distribution system within the MHP.

As part of the consolidation process, the existing well would either be abandoned, or an air gap would be created to separate it from the newly connected CVWD system and prevent any cross-contamination or backflow issues. The existing pipelines from the well

to the onsite distribution pipelines would be cut and capped. Upon consolidation, and once the well has been abandoned or air-gapped, the Villas De Josue SWS would be considered dissolved and no longer be regulated by the Riverside County DEH.

The Modified Project would construct 1- to 2-inch laterals from the proposed 12-inch water main on Fillmore Street. The water service laterals would extend to new CVWD water meters to be installed at the property line, within the public right of way, and then connect to the potable water distribution system. The condition and age of the existing distribution piping is unknown; therefore, the Modified Project would also likely involve construction of new 1- to 2-inch distribution piping. New distribution piping would be installed in the same location as the existing distribution piping, where possible.

The Modified Project would either construct fire hydrants along Fillmore Street or install pipe that would extend from the 12-inch water main in Fillmore Street to the existing fire hydrant located on the Villas de Josue SWS property. This would require a 20-foot-wide easement extending the length of the fire service line to provide access for maintenance. The final location and spacing of fire hydrants would be determined based on compliance with CVWD standards and California Fire Code.

2.3.2 Leon Housing

Existing Conditions

The Leon Housing SWS serves 14 service connections (12 mobile homes, one dwelling unit and one shop). Well information is provided in **Table 2-2**. The water source for this system is a 580-foot deep well with a 5-hp submersible pump. The diameter and casing material of the well is unknown. The well pumps into a 1,000-gallon pressure tank then out to the distribution system of unknown material and diameter. The SWS also has a fire suppression system, which includes a 15,000-gallon storage tank, a booster pump, a bladder tank and two fire hydrants. A two-inch reduced pressure principal backflow prevention device isolates the fire system from the domestic system. An overview of the SWS is shown in **Figure 2-2**.

Table 2-2: Leon Housing Well Information

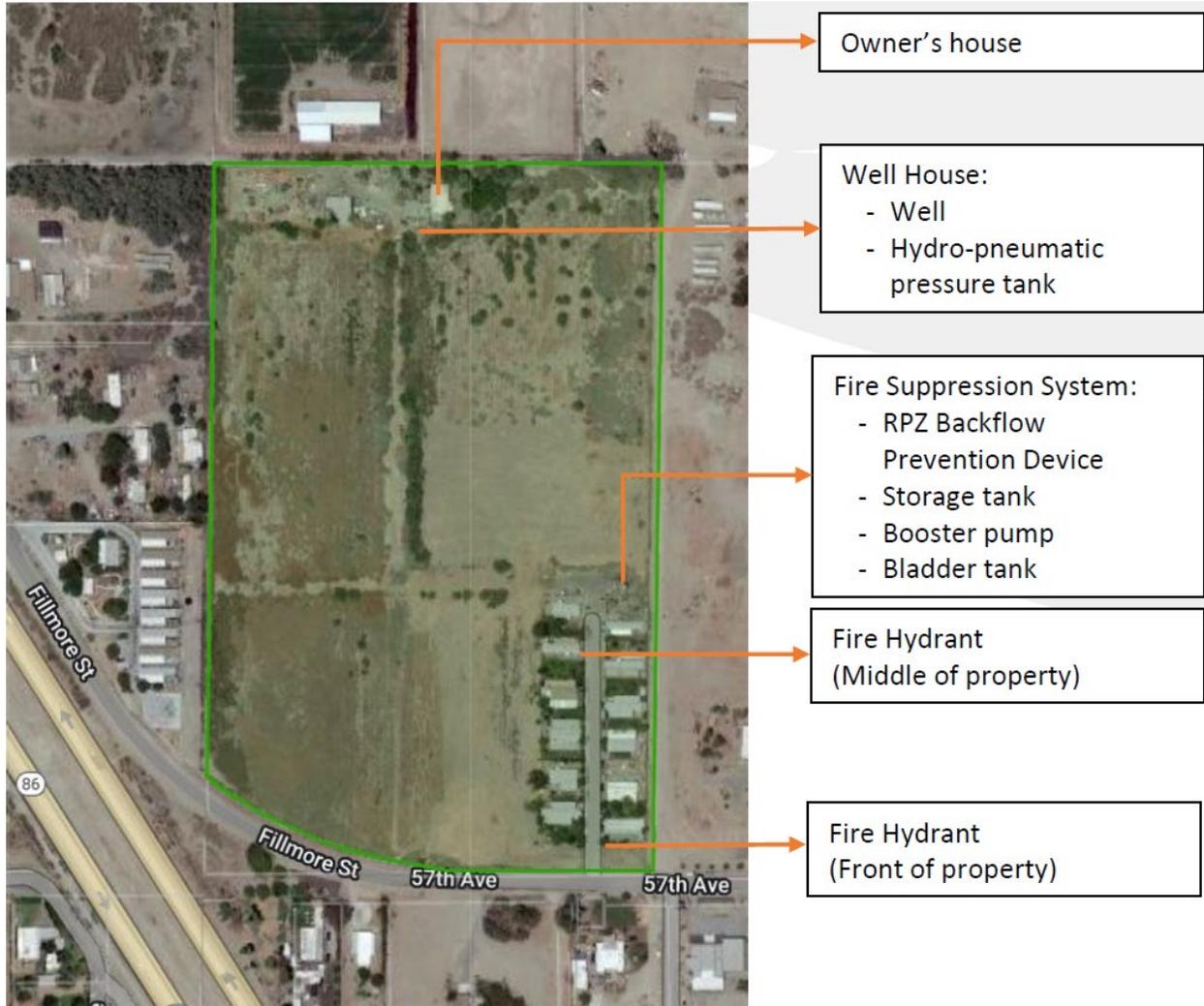
Installation Date	Water Level	Well Depth	Casing Diameter	Casing Type	Pump Motor Type	Pumping Capacity
Original date: 1980s Well refurbished: 2002	Unknown	580 ft	Unknown	Unknown	Submersible	5-hp

According to the property owner, the Leon Housing well was originally installed in the 1980s and was refurbished in 2002. In addition, a new submersible pump was installed in 2018. During an assessment conducted in March 2023 by Moonshot Missions, the well appeared to be in good working condition; however, the sanitary seal seemed to have deteriorated and there were apparent leaks on the well discharge line near the check valve. The 1,000-gallon pressure tank was observed to be in very poor condition with rust,

corrosion, and mold visible on the sides and at the bottom. The pressure tank is welded and disinfected approximately once a year. Access to the well, the pressure tank and the associated equipment was not restricted: the components were housed in a structurally compromised shed. The existing fire suppression system was not pressurized. The 15,000-gallon fire suppression storage tank was observed in March 2023 to be corroded, have multiple holes in it, and the booster pump was in poor condition with the electrical connector exposed. The condition and age of the distribution piping was unknown. A system diagram for Leon Housing can be found in **Figure 2-3**.

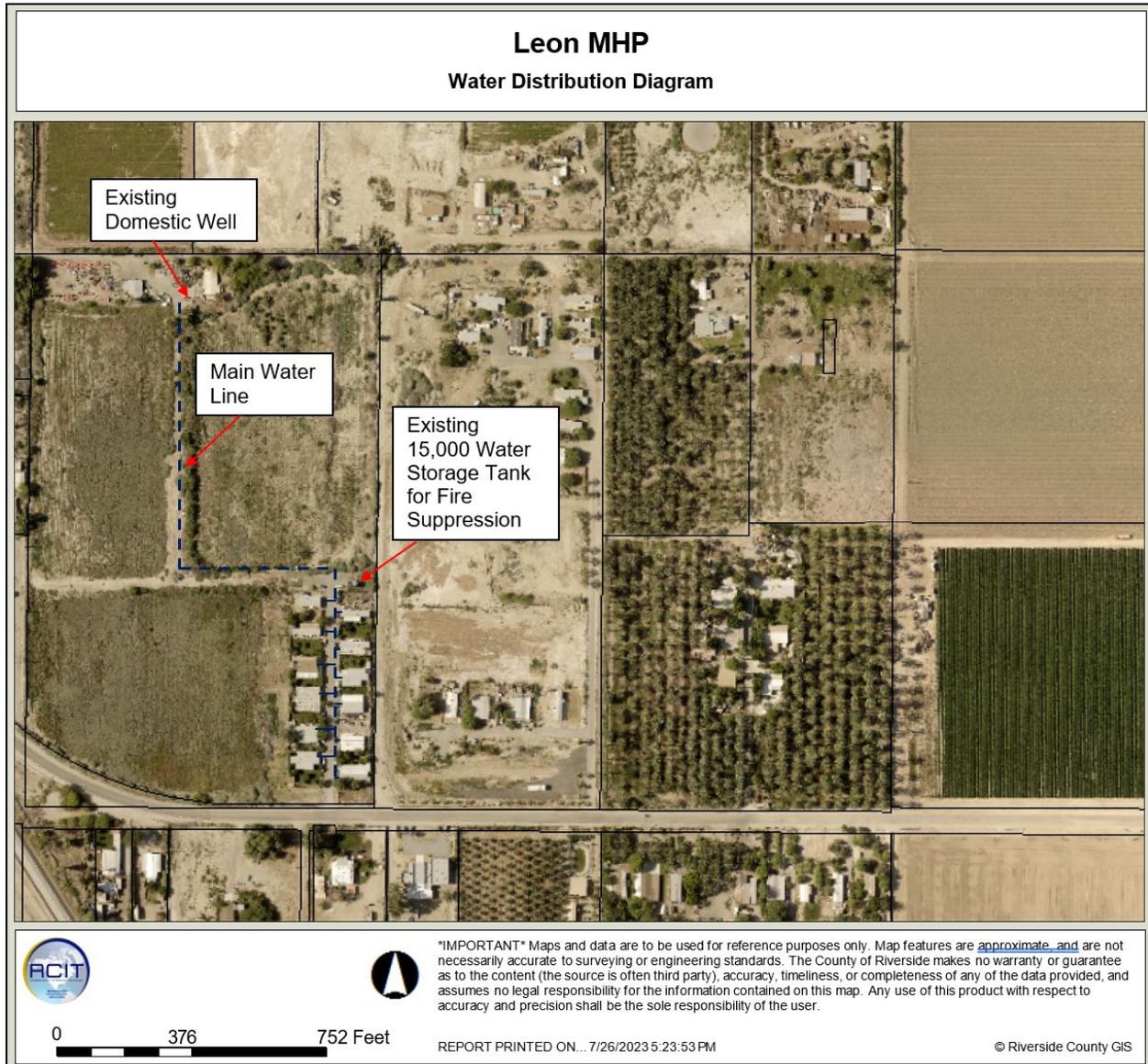
Leon Housing's well is tested for inorganic chemicals once every 10 years. The most recent sample was completed in April 2021 with sampling results showing Leon Housing's well exceeds California's arsenic and fluoride Maximum Contaminant Levels (MCLs). The fluoride level at the well was 2.9 mg/L which exceeds the state's MCL (2 mg/L), and the arsenic level was 14 µg/L which exceeds the state and federal MCL (10 µg/L). MCLs were met for all other regulated constituents. The SWS has reverse osmosis point of use treatment devices installed at each service connection for arsenic and fluoride removal. The SWS is required to monitor for arsenic and fluoride at each unit once a year and for total coliform in the distribution system every quarter.

Figure 2-2: Leon Housing Existing Facilities



Source: Moonshot Missions Leon Housing Water System Needs Assessment

Figure 2-3: Leon Housing System Distribution Diagram



Source: Moonshot Missions Leon Housing Water System Needs Assessment

Modified Project

The Modified Project would connect Leon Housing to CVWD's potable water system via the proposed 12-inch water main on Avenue 57. The consolidation would be a master meter connection wherein Leon Housing's property owner would retain responsibility of maintaining the distribution system within the MHP.

As part of the consolidation process, the existing well would either be abandoned, or an air gap would be created to separate it from the newly connected CVWD system and prevent any cross-contamination or backflow issues. The existing pipelines from the well to the onsite distribution pipelines would be cut and capped. Upon consolidation, and once the well has been abandoned or air-gapped, the Leon Housing SWS would be considered dissolved and no longer be regulated by the Riverside County DEH.

The Modified Project would construct 1- to 2-inch laterals water service lateral pipelines from the proposed 12-inch water main on Avenue 57. The water service laterals would extend to new CVWD water meters to be installed at the property line, within the public right of way, and then connect to the potable water distribution system. The condition and age of the existing distribution piping is unknown; therefore, the Modified Project would also likely involve construction of new 1- to 2-inch distribution piping. New distribution piping would be installed in the same location as existing distribution piping, where possible.

The Modified Project would either construct fire hydrants along Avenue 57 or install pipe that would extend from the 12-inch water main in Avenue 57 to the existing fire hydrants located on the Leon Housing SWS property. This would require a 20-foot-wide easement extending the length of the fire service lines to provide access for maintenance. The final location and spacing of fire hydrants would be determined based on compliance with CVWD standards and California Fire Code.

2.3.3 Duran's Farms

Existing Conditions

The Duran's Farms SWS serves a MHP with 12 service connections. Well information is provided in **Table 2-3**. The water source for this system is a 560-foot deep, 6-inch diameter well with a 28 gallons per minute (gpm) submersible pump. The well pumps into a 2,500-gallon steel storage tank. Two 1-hp booster pumps then send the water to four bladder tanks and out into the distribution system. The distribution system is 2-inch PVC. There is no water treatment or regular disinfection on-site. The SWS also has a fire suppression system consisting of a 15,000-gallon storage tank with a booster pump, a bladder tank and two fire hydrants. However, the fire suppression system is currently offline; the 15,000-gallon storage tank is empty and disconnected. An overview of the SWS is shown in **Figure 2-4**.

Table 2-3: Duran's Farms Well Information

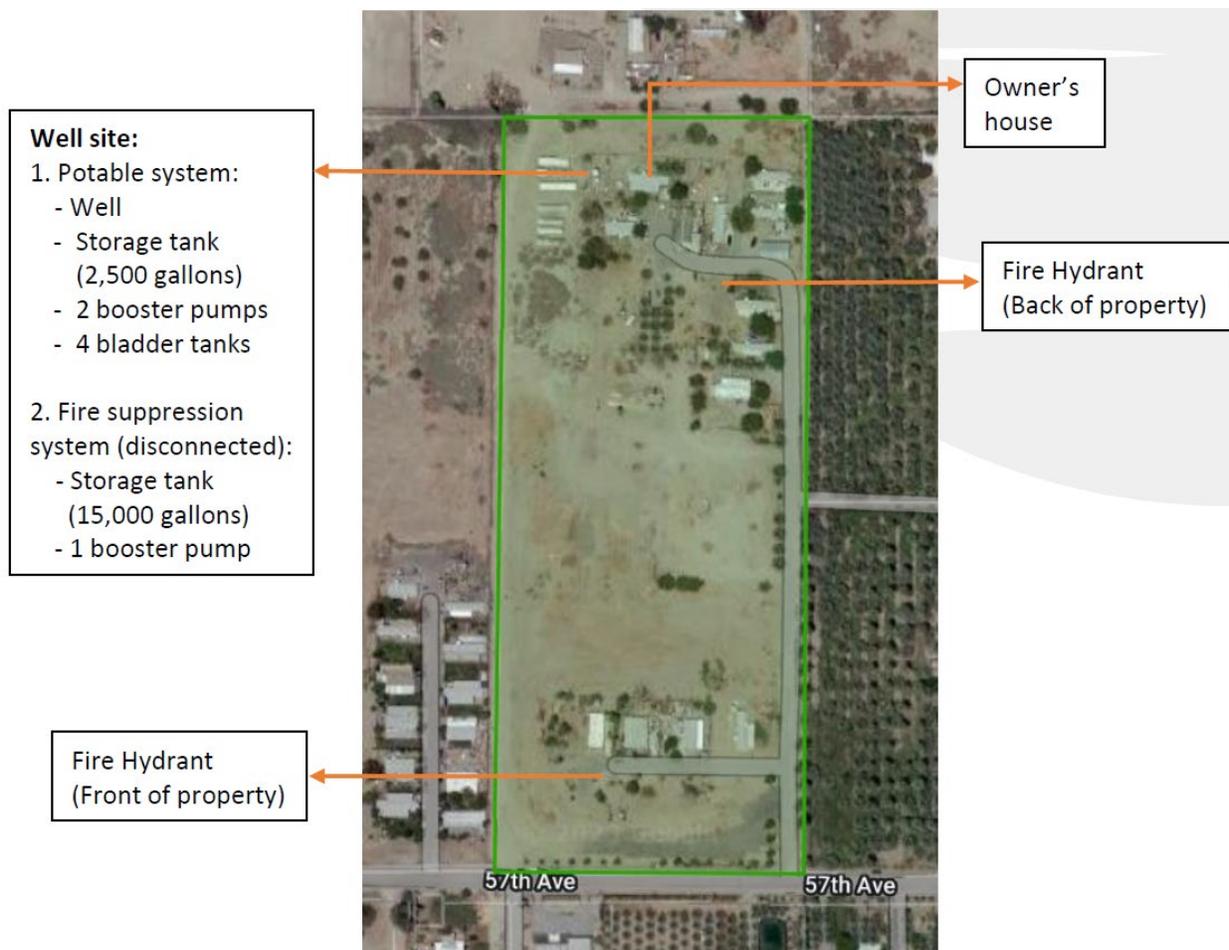
Installation Date	Water Level	Well Depth	Casing Diameter	Casing Type	Pump Motor Type	Pumping Capacity
May 1996	Unknown	560 ft	6-inch	Unknown	Submersible	28 gpm

According to the property owner, Duran's Farms well was installed in 1996 and the well pump has not been replaced since the installation. During an assessment conducted in

May 2023 by Moonshot Missions, the well appeared to be in overall good working condition; however, there was an opening in the well cap where the air vent used to be, and the well pump was nearing the end of its useful life. The installation date of the two 1-hp booster pumps was unknown, although the pumps seemed to be in good condition. The property owner kept a back-up pump on standby. The 2,500-gallon steel storage tank was of unknown age but seemed to be in good condition. The four bladder tanks were new and in great condition; however, they were not equipped with a pressure gauge or a pressure relief valve. Access to the well and the associated equipment was somewhat restricted: components were enclosed by fencing, but the gate was not locked. The condition and age of the distribution piping was unknown. A system diagram for Duran's Farms can be found in **Figure 2-5**.

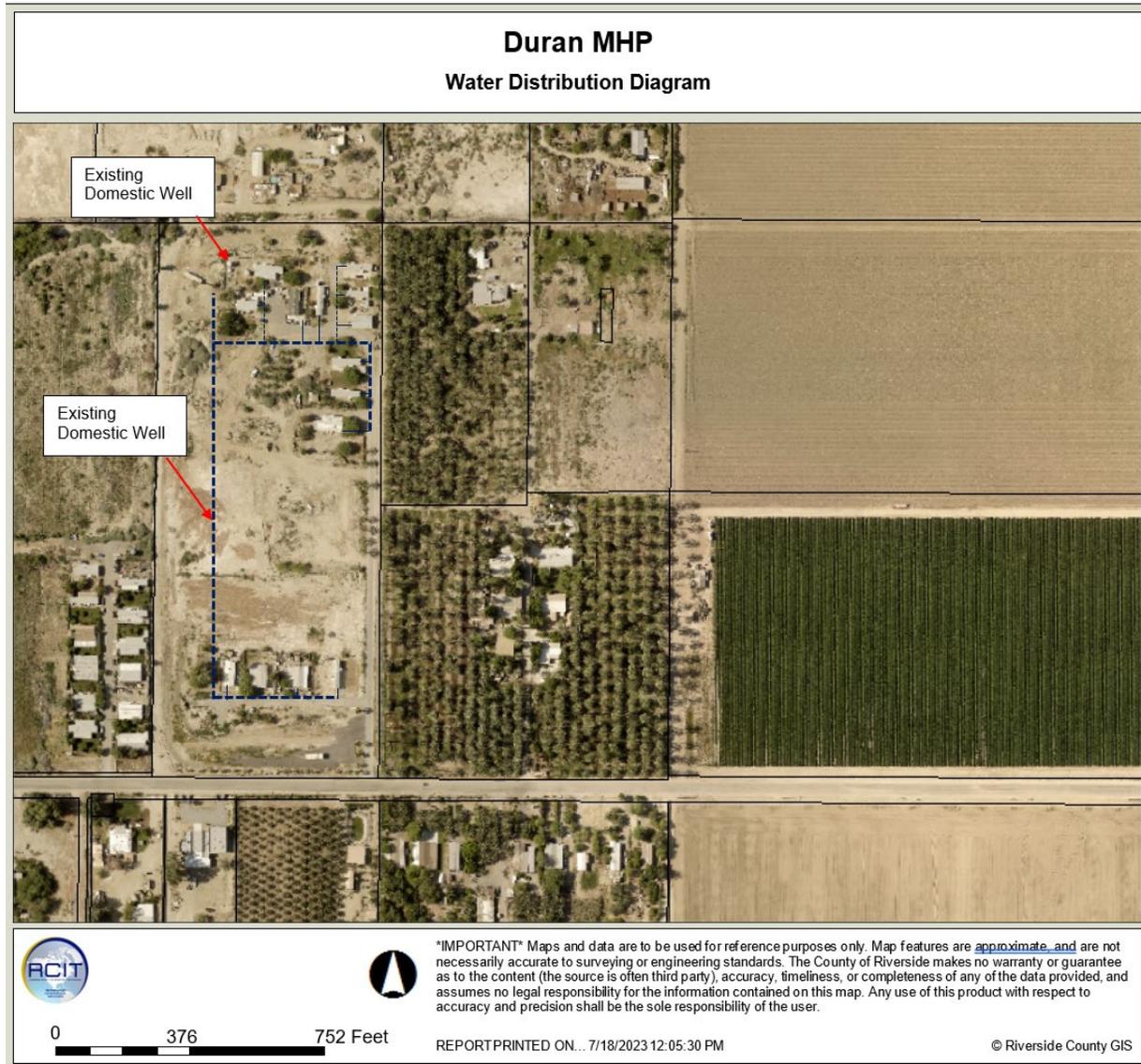
In March 2020, the water system was tested for inorganic chemicals, iron, manganese, chloride, and Total Dissolved Solids. All results were within acceptable State and Federal Safe Drinking Water Act standards.

Figure 2-4: Duran's Farms Existing Facilities



Source: Moonshot Missions Duran's Farms Water System Needs Assessment

Figure 2-5: Duran’s Farms System Distribution Diagram



Source: Moonshot Missions Duran’s Farms Water System Needs Assessment

Modified Project

The Modified Project would connect Duran’s Farms to CVWD’s potable water system via the proposed 12-inch water main on Avenue 57. The consolidation would be a master meter connection wherein Duran’s Farms property owner would retain responsibility of maintaining the distribution system within the MHP.

As part of the consolidation process, the existing well would either be abandoned, or an air gap would be created to separate it from the newly connected CVWD system and

prevent any cross-contamination or backflow issues. The existing pipelines from the well to the onsite distribution pipelines would be cut and capped. Upon consolidation, and once the well has been abandoned or air-gapped, the Duran’s Farms SWS would be considered dissolved and no longer be regulated by the Riverside County DEH.

The Modified Project would construct 1- to 2-inch laterals water service lateral pipelines from CVWD’s proposed 12-inch water main on Avenue 57. The water service laterals would extend to new CVWD water meters to be installed at the property line, within the public right of way, and then connect to the potable water distribution system. The condition and age of the existing distribution piping is unknown; therefore, the Modified Project would also likely involve construction of new 1- to 2-inch distribution piping. New distribution piping would be installed in the same location as existing distribution piping, where possible.

The Modified Project would either construct fire hydrants along Avenue 57 or install pipe that would extend from the 12-inch water main in Avenue 57 to the existing fire hydrants located on the Duran’s Farms SWS property. This would require a 20-foot-wide easement extending the length of the fire service lines to provide access for maintenance. The final location and spacing of fire hydrants would be determined based on compliance with CVWD standards and California Fire Code.

2.3.4 Oscar Cruz Water System

Existing Conditions

Oscar Cruz SWS serves nine service connections. Well information is provided in **Table 2-4**. The water source for this system is a 6-inch well of unknown depth and casing material. It is equipped with a 2-hp submersible pump that conveys water to a 2,000-gallon steel pressure tank then out to the distribution system. The distribution system consists of a 3-inch PVC looped main with 1-inch PVC laterals per Riverside County DEH’s March 2022 inspection report. There is no treatment on site. The SWS also has a fire suppression system consisting of a 15,000-gallon storage tank with a 10-hp booster pump and two fire hydrants. An overview of the SWS is shown in **Figure 2-6**.

Table 2-4: Oscar Cruz MHP Well Information

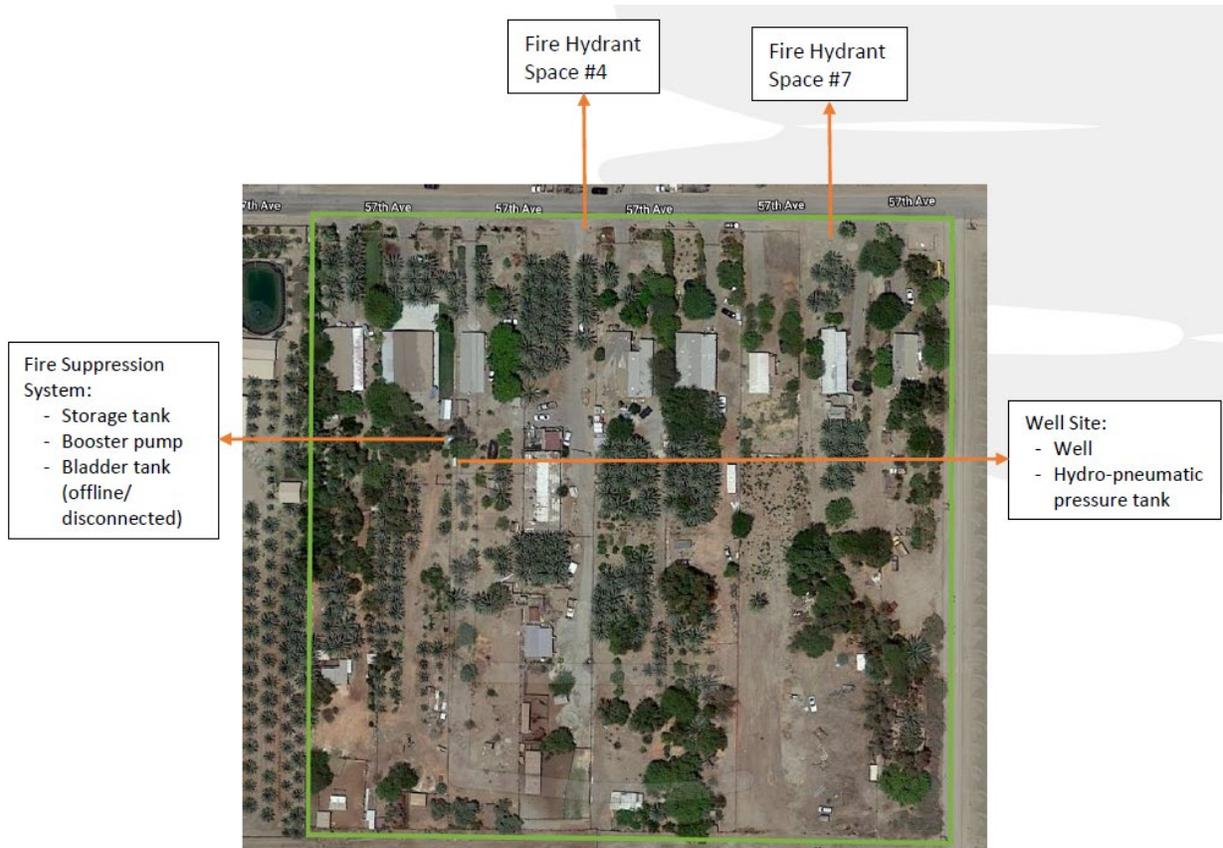
Installation Date	Water Level	Well Depth	Casing Diameter	Casing Type	Pump Motor Type	Pumping Capacity
March 2008	Unknown	Unknown	6-inch	Unknown	Submersible	2-hp

According to the property owner, the Oscar Cruz SWS was installed in 2008 and the system is still using the original pump. During an assessment conducted in March 2023 by Moonshot Missions, the well and the pressure tank appeared to be in good working condition; however, the well sanitary seal was not fully intact, and the well pump was nearing the end of its expected lifespan. Access to the well, the pressure tank and the associated equipment was restricted. The fire suppression system seemed to be in

overall good condition; however, the property owner indicated that the booster pump had been in place for approximately 25 years. The condition of the distribution piping was unknown. A system diagram for Oscar Cruz can be found in **Figure 2-7**.

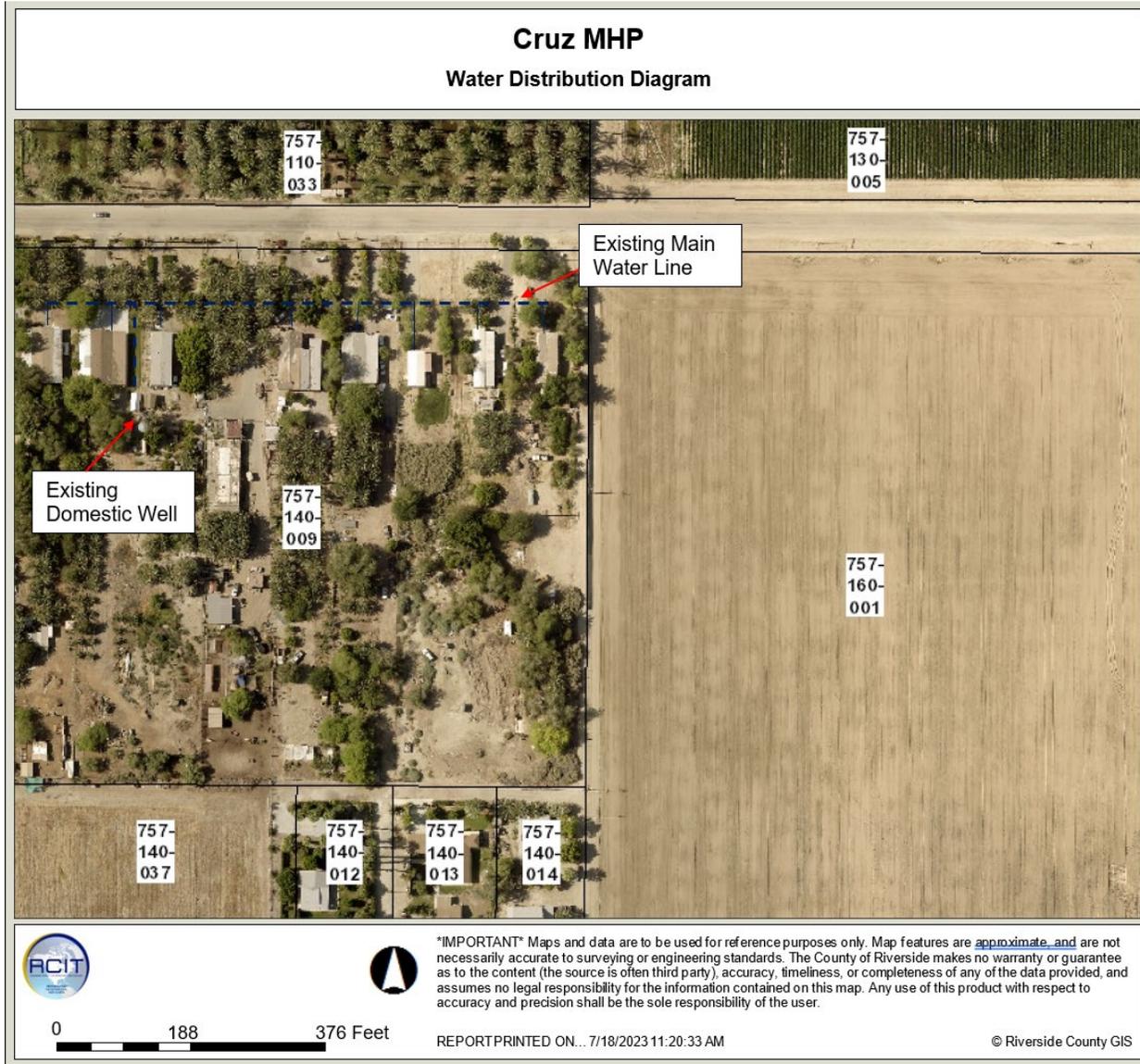
In April 2021, the water system was tested for inorganic chemicals, iron, manganese, chloride, and Total Dissolved Solids. All results were within acceptable State and Federal Safe Drinking Water Act standards.

Figure 2-6: Oscar Cruz Existing Facilities



Source: Moonshot Missions Oscar Cruz Water System Needs Assessment

Figure 2-7: Oscar Cruz System Distribution Diagram



Source: Moonshot Missions Oscar Cruz Water System Needs Assessment

Modified Project

The Modified Project would connect Oscar Cruz to CVWD’s potable water system via the proposed 12-inch water main on Fillmore Street. The consolidation would be either a master meter connection wherein Oscar Cruz’s property owner would retain responsibility of maintaining the distribution system within the MHP; or, given the layout of the existing system distribution and proximity of the mobile homes to Avenue 57, a direct connection of each mobile home to CVWD’s potable system.

Oscar Cruz has date palms, and the property owner has expressed a desire to retain the well for irrigation purposes following the consolidation. As part of the consolidation process, installation of the required backflow prevention equipment for the irrigation system would be installed to prevent any potential cross-contamination. The existing pipelines from the well to the onsite distribution pipelines would be cut and capped. Upon consolidation, the Oscar Cruz SWS would be considered dissolved and no longer be regulated by the Riverside County DEH.

The Modified Project would construct 1- to 2-inch laterals water service lateral pipelines from the proposed 12-inch water main on Avenue 57. The water service laterals would extend to new CVWD water meters to be installed at the property line, within the public right of way, and then connect to the potable water distribution system. The condition and age of the existing distribution piping is unknown; therefore, the Modified Project would also likely involve construction of new 1- to 2-inch distribution piping. New distribution piping would be installed in the same location of existing distribution piping, where possible.

The Modified Project would either construct fire hydrants along Avenue 57 or install pipe that would extend from the 12-inch water main in Avenue 57 to the existing fire hydrants located on the Oscar Cruz SWS property. This would require a 20-foot-wide easement extending the length of the fire service line to provide access for maintenance. The final location and spacing of fire hydrants would be determined based on compliance with CVWD standards and California Fire Code.

2.4 Modified Project Infrastructure

The Modified Project consists of consolidation of four independent SWSs into CVWD's potable water system, as shown in **Figure 1-2**. The infrastructure for the Modified Project would consist of the following:

- 7,400 linear feet of new 12-inch diameter potable water mains within public right-of-way along Fillmore Street and Avenue 57 to Pierce Street in unincorporated Riverside County. The main in Fillmore Street and Avenue 57 would connect to the existing CVWD water system within Airport Boulevard and Pierce Street.
- Water main pipeline appurtenances, including fire hydrants, blow-off assemblies, and valves.
- 80 linear feet of 1-inch and 2-inch diameter water service laterals. These would connect to the proposed 12-inch water mains in Fillmore Street and Avenue 57 and would extend to the property boundaries of Duran's Farms, Leon Housing, Oscar Cruz Water System, and Villas de Josue MHP SWSs. Service laterals would be brought up to each SWS property boundary where a pair of CVWD master meters would be installed at locations that serve multiple connections or a single CVWD master meter at locations that serve one connection.

- On-property pipelines to complete water service to each SWS. These pipelines would connect the 1-inch and 2-inch diameter water laterals to the potable water distribution system at each SWS. On-property pipeline diameter would match the distribution system piping. On-property piping would be extended from the property boundary to the location of the existing well discharge piping, where it would connect to the potable water distribution system at each SWS. New on-property distribution piping, if needed, would be installed in the same location as existing distribution piping, where possible. There is a total of approximately 3,500 linear feet of on-property system distribution piping across Leon Housing, Duran's Farm and Oscar Cruz, and an unknown amount at Villas de Josue. Some of the existing onsite piping is relatively new and may not need to be replaced.
- 6-inch diameter piping connecting from the proposed water mains to fire hydrants or backflow preventors to provide fire service to each SWS. Fire hydrants would be located in accordance with CVWD and Riverside County Fire Department standards.
- Modifications to the existing onsite SWSs may include removal of some existing infrastructure (e.g., tanks, pipelines, connections).

The domestic water pipeline would deliver potable water to meet demand at Duran's Farms, Leon Housing, Oscar Cruz Water System, and Villas de Josue MHP. Construction and operation of the Modified Project is described in further detail below.

2.4.1 Construction Methods

Well Demolition

Abandoning an on-site existing well involves well demolition. The process of well demolition would depend on the size and depth of the well. Generally, for shallower and/or smaller diameter wells, the well would be over-drilled and then the borehole backfilled with grout. Larger or deeper wells would require perforating the casing (often with a subsurface explosion containing bb's) and then pressure-grout the well/borehole. The work would be conducted in accordance with a County DEH well demolition permit and performed by a certified well driller (license required), with oversight by a County DEH inspector and in conformance with State well standards.

Pipeline Installation – Open Cut

As with the Approved Project described in the MND, the water pipeline of the Modified Project would be installed within existing County of Riverside roadways and the SWS properties. Typical pipeline construction processes are described below:

- **Staging Area(s)** – Staging area would be required along the construction route to store pipe, construction equipment, and other construction-related material. Potential staging areas may include vacant private and public land, parking lots, and segments of closed traffic lanes.

- **Surface Preparation** – Surface preparation involves removing structures (such as fences or posts), pavement, and/or vegetation from the trenching. Equipment may include jack hammers, pavement saws, graders, bulldozers, loaders, and trucks.
- **Trench Excavation/Shoring** – A backhoe, excavator, or trencher would be used to dig trenches for pipe installation. In general, trenches would have vertical side walls to minimize the amount of soil excavated, and the area needed for the construction easement. Soils excavated from the trenches, if of suitable quality, would be stockpiled alongside the trench or in staging areas for later reuse in backfilling the trench. If not reusable, the soil would be hauled off site for disposal. Disposal options include use as cover material at sanitary landfills and use as “clean fill” at other sites. The construction contractor is responsible for determining how much soil would be used onsite as backfill, how much clean fill soil would be imported to the construction site, and where the soil hauled offsite would be ultimately disposed. In general, pipe trenches would be three to five feet wide and five to six feet deep for the water main.

The Modified Project’s maximum area of disturbance during the construction period would encompass approximately 74,000 square feet (1.7 acres), assuming a 10-foot buffer on either side of the pipeline trenching alignment for staging areas. In addition, onsite work could occur within the boundaries of Duran’s Farms (15.5 acres), Leon Housing (23.1 acres), Oscar Cruz Water System (9.6 acres), and Villas de Josue MHP (2.1 acres).

The pipeline trench would be open for two to three days on average. During construction, vertical wall trenches would be temporarily “closed” at the end of each workday, by covering with steel plates or backfilled. The trench would be backfilled with either the excavated soil or imported material. Dump trucks would be used to deliver imported, engineered backfill material to stockpiles near the trenching operation. Native soil would be reused for backfill to the greatest extent possible; however, the soil may not have the properties necessary for compactability and stability.

All construction activities would occur within the County of Riverside roadway rights-of-way and SWS properties. Disturbance activities would occur on existing dirt access roads and in vegetated areas adjacent to the access roads. Disturbed areas would be restored to original grade and vegetated areas would be replanted with appropriate native species.

- **Surface Restoration** – After the pipe is installed, the ground surface of the pit areas would be restored. When pipe is installed on paved roadways, the asphalt would be patched and restored to pre-construction conditions. When the pipe is installed in dirt access roads, the dirt would be graded and compacted. In natural or vegetated areas, native plantings would be installed.

2.4.2 Construction Equipment and Staging

The construction equipment required for the Modified Project would be the same as that listed in the Approved MND for open cut pipeline installation and is listed in **Table 2-5**.

Table 2-5: Construction Equipment

Equipment	Number Required for Pipeline
Cement and Mortar Mixer	1
Excavator	1
Forklift	1
Paver	1
Paving Equipment	1
Rollers	2
Tractors/Loaders/Backhoes	6
Trencher	1

2.4.3 Construction Trip Generation

During construction, the Modified Project would generate trips associated with construction crews and material deliveries. Construction of the 7,400 linear feet of 12-inch pipeline would proceed at a rate of approximately 100 linear feet per day. Construction would generate up to 20 round-trip trips per day, including one round trip for off hauling of export material, and one round trip for delivery of materials. Construction would involve approximately 8,400 cubic yards of material export, assuming as much native fill is reused for backfill of the trench as possible. Exported material would be deposited at the nearest landfill that can accommodate the type of soil waste generated, as determined by the construction contractor.

2.4.4 Construction Schedule

Construction is anticipated to last approximately one year. Project construction activity is anticipated to occur continuously, between the hours of 7:00 a.m. and 6:00 p.m., Monday through Friday only and excluding federal holidays, which is compliant with the County of Riverside Ordinance Regulating Noise.

2.4.5 Construction Best Management Practices

CVWD would require implementation of the following construction best management practices (BMPs) with the Modified Project:

- **Drainage / Erosion Control** - During the construction, existing storm water facilities including catch basins, manholes, and ditches would be protected using erosion control measures. Design standards outlined in the *Riverside County Whitewater River Region Stormwater Quality Best Management Practice Design Handbook for Low Impact Development* (Riverside County Flood Control and Watershed Conservation District 2014) would be implemented as applicable to the Modified Project site's stormwater drainage features. In addition, the project contractor would be required to obtain a Construction General Permit pursuant to the National Pollutant Discharge Elimination System (NPDES) construction storm

water regulations, which would require development of a construction Stormwater Pollution Prevention Plan (SWPPP) and implementation of BMPs to prevent polluted runoff from leaving the construction site.

- **Groundwater Dewatering** - The Modified Project pipe would be installed at a depth of five to six feet below ground surface. If encountered at this depth, groundwater would be controlled using standard methods including stone sumps wrapped in filter fabric and dewatering basins or baffled tanks if required.
- **Traffic Controls** - Construction of the Modified Project may necessitate an individual traffic lane closure along Fillmore Street and Avenue 57. Traffic control requirements would require that emergency crews have access, as needed, and that the contractor coordinates the location of the work daily for routing of emergency vehicles. Traffic control would also require the contractor to make reasonable efforts, wherever possible, to provide landowners access to their property and patrons access to businesses during execution of the work. Refer to **Mitigation Measure TRA-1** Traffic Control Plan.
- **Air Quality / Dust Suppression** – The construction contractor would be required to comply with South Coast Air Quality Management District (SCAQMD) rule 403.1 to control dust during construction, specific to the Coachella Valley. The contractor is required to have an approved Fugitive Dust Control Plan prior to grading or excavation. The contractor is required to comply with the California Air Resources Boards In-Use Off-Road Diesel-Fueled Fleets Regulations, which would limit vehicle idling time to five minutes, restrict adding vehicles to construction fleets that have lower than Tier 3 engines, and establish a schedule for retiring older, less fuel-efficient engines from the construction fleet.

2.4.6 Operation and Maintenance

CVWD would continue to operate its domestic water system and sewer system with no operational modifications. The pipelines would not be associated with long-term energy usage or additional CVWD operation and maintenance (O&M) activities.

2.5 Permits and Approvals

The permits and approvals listed in **Table 2-6** may be required prior to construction of the Modified Project.

Table 2-6: Permits and Approvals

Agency	Permit/Approval
Local	
County of Riverside	<ul style="list-style-type: none"> • Encroachment, Road and Construction Permits • Well Demolition Permit
South Coast Air Quality Management District	<ul style="list-style-type: none"> • Fugitive Dust Control Plan
State	
State Water Resources Control Board (SWRCB)	<ul style="list-style-type: none"> • Drinking Water Supply Permit Amendment • Drinking Water Supply Deactivation notification letter • NPDES General Permit for Storm Water Discharges associated with Construction Activities
Regional Water Quality Control Board (RWQCB), Colorado River Region	<ul style="list-style-type: none"> • General Permit for Construction Discharges (dewatering/test water)
Federal	
United States Environmental Protection Agency / SWRCB	<ul style="list-style-type: none"> • Funding under the Drinking Water State Revolving Fund

3. EVALUATION OF ENVIRONMENTAL IMPACTS

The following includes the environmental checklist review pursuant to CEQA. The analysis herein evaluates the adequacy of the environmental impact findings and mitigation in the Approved Project, the Valley View MHP Water Consolidation Project, relative to impacts and mitigation of the Modified Project. The Valley View MHP Water Consolidation Project MND was approved by the CVWD Board of Directors on September 24, 2019. The Valley View MHP Water Consolidation Project Subsequent MND was approved by the CVWD Board of Directors on April 12, 2022. Addendum 1 to the Valley View MHP Water Consolidation Project MND and Subsequent MND was approved by the CVWD Board of Directors on July 11, 2023.

Agriculture and Forestry Resources

As explained in Section 1.4 Evaluation of Environmental Impacts, resource areas that were found to have No Impact or Less than Significant Impact in the MND, and for which the Modified Project would also result in a finding of No Impact or Less than Significant Impact, are not analyzed further in this Addendum. This includes checklist questions (c), (d), and (e) under Agriculture and Forestry Resources. The resource areas under checklist questions (a) and (b) are analyzed.

(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use

Approved Project

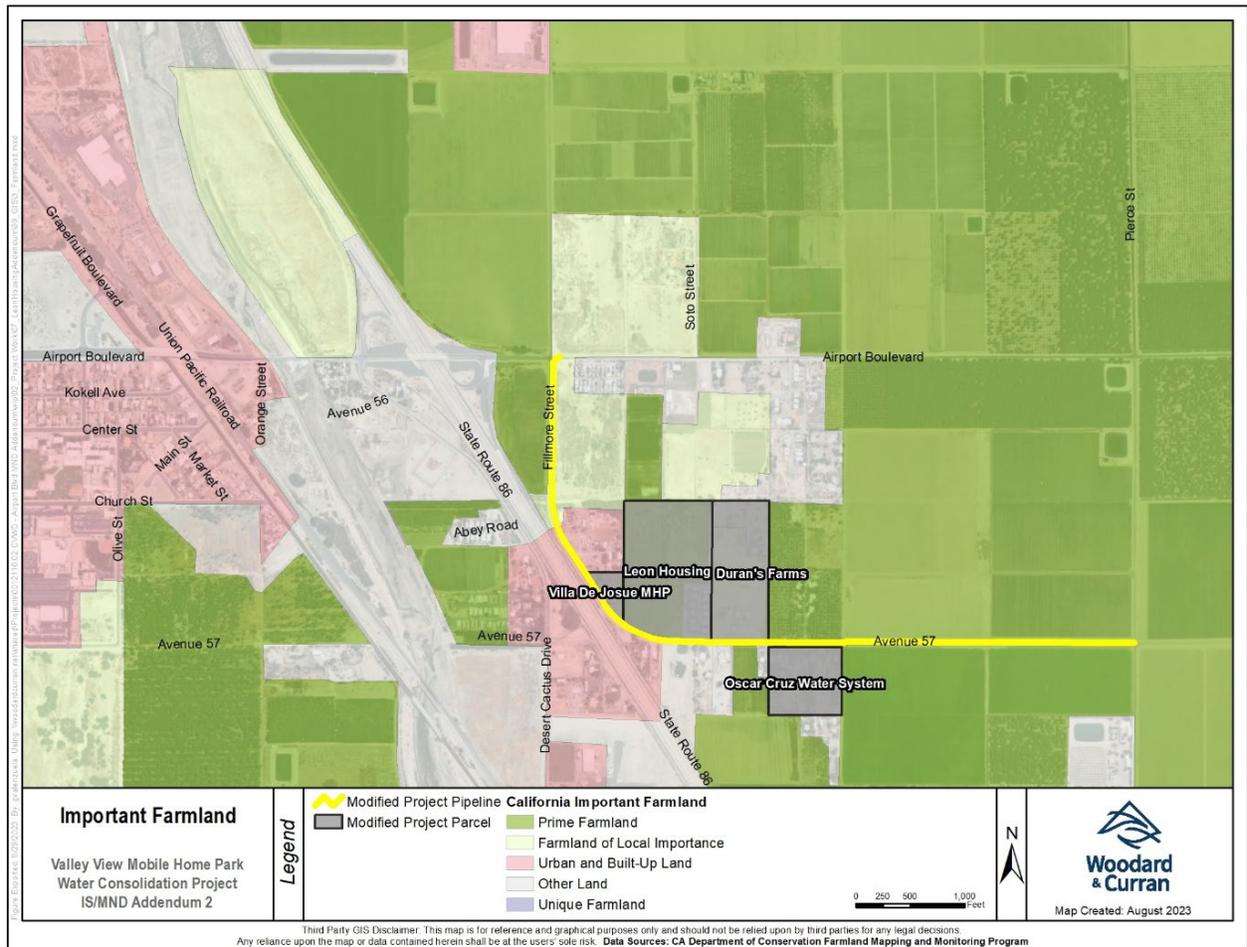
The MND found that the Approved Project would not interfere with existing agricultural operations. Although a majority of the area surrounding the Approved Project is mapped as important farmland, the pipelines would be constructed within existing roadway rights-of-way as well as on privately owned properties to connect CVWD's potable water system to the properties. The majority of the project components would be located below-grade and ground surfaces would be restored to pre-construction conditions. The Approved Project would not result in land use changes and would, therefore, not convert important farmland to a nonagricultural use or result in other changes that would indirectly result in conversion of nearby farmland to non-agricultural use. Therefore, the impacts would be less than significant.

Modified Project

Similar to the Approved Project, the Modified Project area is generally designated agricultural, with substantial areas classified as Prime Farmland and Farmland of Local Importance. The Modified Project would install potable water pipelines within existing rights-of-way along with onsite water service lines, if needed, within the four additional SWS communities (**Figure 3-1**). As explained in *Section 2.4.1*, because these pipelines would generally be located within rights-of-ways and buried at a maximum depth of six feet, and disturbed surfaces would be restored to pre-construction conditions, pipelines

would not interfere with existing agricultural operations. New on-property distribution piping would be installed in the same location as existing distribution piping, where possible, and would have no impact to existing agricultural operations. The Modified Project would primarily serve existing and planned populations and would not induce growth (refer to *Section 3.14, Population and Housing*). The Modified Project would not result in land use changes and would, therefore, not convert important farmland to a non-agricultural use. Therefore, there would be no new impact as a result of the Modified Project and no new mitigation would be required.

Figure 3-1: Important Farmland



(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract

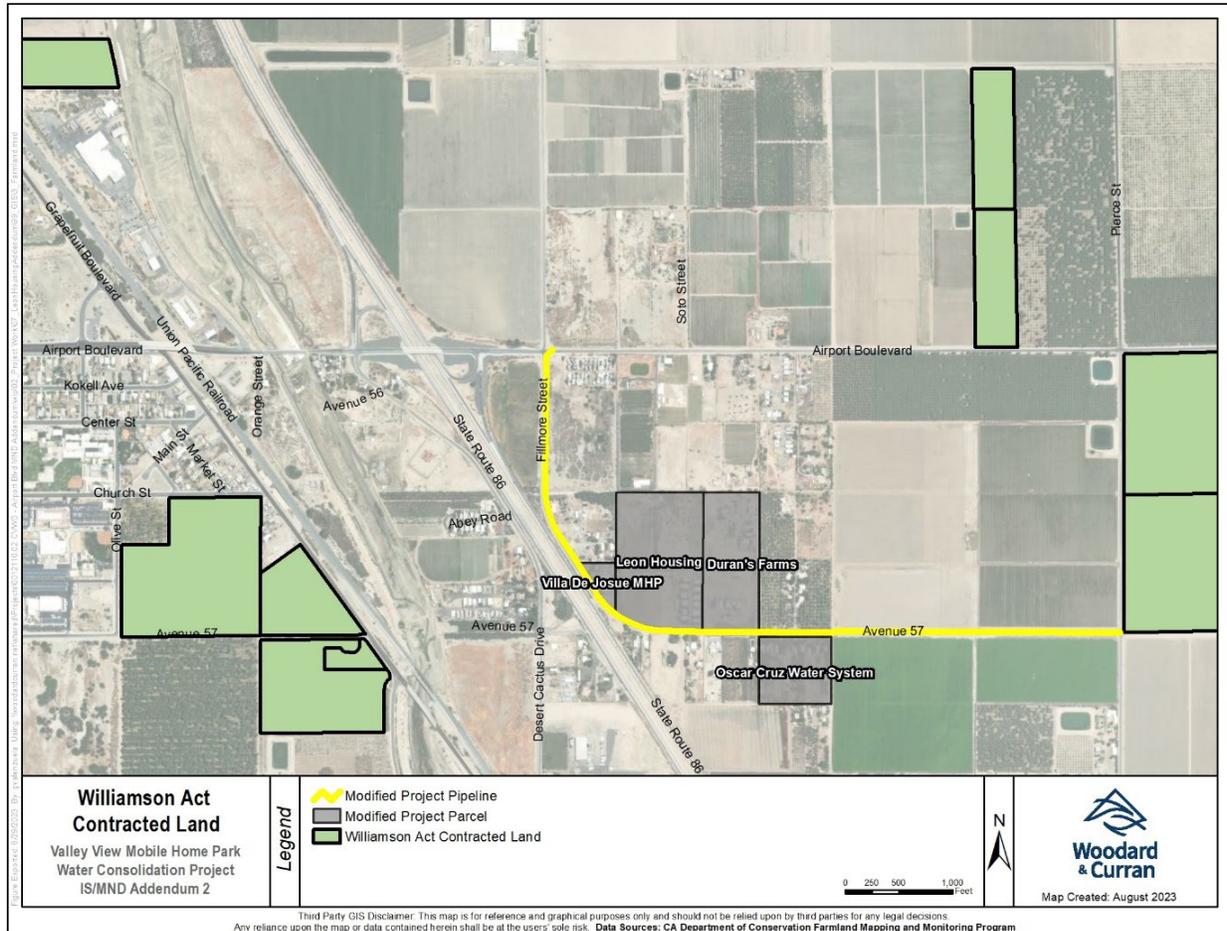
Approved Project

The MND found that the Approved Project would not directly impact Williamson Act contracted lands because pipelines would be constructed within the existing right of way and the land use and zoning of those lands would not be altered. Therefore, the impacts would be less than significant.

Modified Project

Similar to the Approved Project, no portion of the Modified Project is located within a Williamson Act contracted land and the land use and zoning of those lands would not be altered (**Figure 3-2**). Therefore, there would be no new impact as a result of the Modified Project and no new mitigation would be required.

Figure 3-2: Williamson Act Contracted Land



Mitigation Measures

None required.

Air Quality

As explained in *Section 1.4 Evaluation of Environmental Impacts*, resource areas that were found to have No Impact or Less than Significant Impact in the MND, and for which the Modified Project would also result in a finding of No Impact or Less than Significant Impact, are not analyzed further in this Addendum. This includes checklist question (d)

under Air Quality. The resource areas under checklist questions (a), (b) and (c) are analyzed.

(a) Conflict with or obstruct implementation of the applicable air quality plan

Approved Project

The applicable air quality plan for the Approved Project is the SCAQMD's 2016 Air Quality Management Plan (AQMP), which assesses the attainment status of the Coachella Valley portion of the Salton Sea Air Basin (SSAB) and provides a strategy for attainment of state and federal air quality standards. The 2016 AQMP strategies are developed based on population, housing, and employment growth forecasts anticipated under local city general plans and the Southern California Association of Governments' (SCAG) 2016 Regional Transportation Plan/Sustainable Communities Strategy.

The MND found that the Approved Project would not lead to unplanned population, housing, or employment growth that exceeded the forecasts used in the development of the SCAQMD AQMP, and thus impacts would be less than significant.

Modified Project

Similar to the Approved Project, the Modified Project is located within the Coachella Valley portion of the SSAB and is subject to the SCAQMD's air quality plan. However, the air quality plan has been updated since the MND was published. The applicable air quality plan for the Modified Project is the 2022 AQMP (SCAQMD 2022). The 2022 AQMP represents an updated regional blueprint for achieving state and federal air quality standards in the Coachella Valley portion of the Salton Sea Air Basin. The 2022 AQMP strategies are developed based on updated population, housing, and employment growth forecasts anticipated under local city general plans and the SCAG's 2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy, also known as Connect SoCal.

A project would conflict with or obstruct an applicable air quality plan if it would lead to population, housing or employment growth that exceeds the forecasts used in the development of the applicable air quality plan. The Modified Project would construct approximately 7,480 linear feet of main pipelines and laterals and various onsite service lines to consolidate four independent, privately owned SWSs into CVWD's potable water system. The Modified Project would expand CVWD's potable water infrastructure and would serve a pre-determined number of existing communities, which currently rely on SWSs, with reliable water service. Therefore, the Modified Project would not lead to population, housing or employment growth that exceeds the forecasts used in the development of the 2022 AQMD. There would be no new impact as a result of the Modified Project and no new mitigation would be required.

(b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard

Approved Project

The MND conducted air emissions modeling using the California Emissions Estimator Model (CalEEMod) version 2016.3.2 to estimate the Approved Project's criteria air pollutant emissions. Model emissions scenarios were based on project-specific information and CalEEMod default values in instances where project-specific information was not available (e.g., construction equipment horsepower, length of worker trips, soil moisture content). Construction emissions are shown in **Table 3-1**. The MND found that neither construction nor operational emissions would exceed SCAQMD regional thresholds for maximum daily emissions. Therefore, the Approved Project would not result in a cumulatively considerable net increase of a criteria pollutant for which the SSAB is non-attainment.

Table 3-1: Approved Project (Combined Valley View MHP and Phase III A-2 Pipeline) Maximum Daily Construction Emissions (lbs/day)

Emissions Source	NO _x	ROG	CO	SO _x	PM _{2.5}	PM ₁₀
Construction equipment	41.5	4.5	49	<0.1	2.2	2.4
Offsite emissions	1.5	0.5	4	<0.1	0.4	1.2
Fugitive dust (with required fugitive dust controls)	--	--	--	-	<0.1	<0.1
Total Maximum Daily Emissions	43	5	53	<0.1	2.6	3.6
<i>SCAQMD Regional Thresholds</i>	<i>100</i>	<i>75</i>	<i>550</i>	<i>150</i>	<i>55</i>	<i>150</i>
Threshold exceeded?	No	No	No	No	No	No
Sources: Regional Thresholds: SCAQMD 2019; SCAQMD 2009. Notes: NO _x = nitrogen oxides; ROG = reactive organic gases; CO = carbon monoxide; SO _x = sulfur oxides; PM ₁₀ = respirable particulate matter; PM _{2.5} = fine particulate matter. The Coachella Valley portion of the Salton Sea Air Basin is in non-attainment status for ozone; the SCAQMD regulates ozone precursors, NO _x and ROG. The Coachella Valley portion of the Salton Sea Air Basin is also non-attainment for PM ₁₀ . SCAQMD is required to maintain ambient air quality standards for CO, SO _x , and PM _{2.5} .						

Modified Project

Air emissions of criteria pollutants during construction would result from the use of construction equipment with internal combustion engines, and offsite vehicles to transport workers, deliver materials to the site, and haul export material from the site. As described within *Section 2.4 Modified Project Infrastructure*, the type of equipment and construction method proposed for the Modified Project would be the same as those used for construction of the Approved Project. Therefore, the criteria air pollutant emissions estimated for construction of the Approved Project would be similar to the cumulative criteria air pollutant emissions estimated for construction of the Modified Project because the type of construction equipment and method are the same, and the required usage of vehicles and equipment would be similar.

Similar to the Approved Project, the air emissions from the Modified Project were modeled using the CalEEMod. **Table 3-3** summarizes the maximum daily pollutant emissions during construction of the Modified Project.

Table 3-2: Modified Project (Leon Housing MHP) Maximum Daily Construction Emissions (lbs/day)

Emissions Source	NO _x	ROG	CO	SO _x	PM _{2.5}	PM ₁₀
Construction equipment	13.1	1.5	19.3	<0.1	0.5	0.6
Offsite emissions	0.2	0.1	1.7	<0.1	0.06	0.3
Fugitive dust (with required fugitive dust controls)	--	--	--	-	0.06	0.3
Total Maximum Daily Emissions	13	2	21	<0.1	0.6	1.1
<i>SCAQMD Regional Thresholds</i>	<i>100</i>	<i>75</i>	<i>550</i>	<i>150</i>	<i>55</i>	<i>150</i>
Threshold exceeded?	No	No	No	No	No	No

Sources: Regional Thresholds: SCAQMD 2019; SCAQMD 2009.

As shown in **Table 3-3**, Modified Project construction emissions are far below SCAQMD regional thresholds. Cumulative Approved and Modified Project emissions are also below SCAQMD thresholds, as shown in the following table. As a result, the cumulative pollutant emissions from the Approved Project and Modified Project would not exceed SCAQMD regional thresholds and would not result in a cumulatively considerable net increase of a criteria pollutant for which the SSAB is non-attainment. No new construction impacts would occur, and no new mitigation would be required.

Table 3-3: Combined Valley View MHP, Phase III A-2 Pipeline, and Leon Housing MHP Maximum Daily Construction Emissions (lbs/day)

Emissions Source	NO _x	ROG	CO	SO _x	PM _{2.5}	PM ₁₀
Construction equipment	54.6	6.0	68.3	<0.1	2.7	3.0
Offsite emissions	1.7	0.6	5.7	<0.1	0.5	1.5
Fugitive dust (with required fugitive dust controls)	--	--	--	-	<1	<1
Total Maximum Daily Emissions	56.3	6.6	74.0	<0.1	3.2	4.7
<i>SCAQMD Regional Thresholds</i>	<i>100</i>	<i>75</i>	<i>550</i>	<i>150</i>	<i>55</i>	<i>150</i>
Threshold exceeded?	No	No	No	No	No	No

Sources: Regional Thresholds: SCAQMD 2019; SCAQMD 2009.

The Modified Project would not be associated with long-term energy usage or additional operation and maintenance activities. Inspection and maintenance of the pipeline would be incorporated into CVWD's existing operation and maintenance activities. Thus, no new emissions would be associated with operation of the Modified Project and no new mitigation would be required.

(c) Expose sensitive receptors to substantial pollutant concentrations

Approved Project

As discussed in the MND, construction and operational emissions would not exceed the SCAQMD regional thresholds or the localized significance thresholds (LSTs), which are

set at levels that protect public health within the immediate area under active construction. Although sensitive receptors would be exposed to air pollutant emissions while adjacent pipelines are being actively installed, construction emissions would be temporary and would not be located in the same location for the entire construction period. In addition, the Approved Project would not have the potential to cause a carbon monoxide hotspot on roadways adjacent to sensitive receptors. Therefore, impacts to sensitive receptors would be less than significant.

Modified Project

As shown in **Table 3-4** under “b” above, the Modified Project’s construction and operational emissions, cumulatively with the Approved Project, would not exceed the SCAQMD. Furthermore, as shown in **Table 3-4** the Modified Project’s construction emissions would not exceed the LSTs, which are set at levels that protect public health, within a one-acre active construction site area.

Table 3-4: Modified Project (Leon Housing MHP) Maximum Daily Construction Emissions (lbs/day) compared to LSTs

Emissions Source	NO _x	CO	PM _{2.5}	PM ₁₀
Construction equipment	13.1	19.3	0.5	0.56
Offsite emissions	0.2	1.7	0.06	0.26
Fugitive dust (with required fugitive dust controls)	--	--	0.06	0.26
Total Maximum Daily Emissions	13.3	21	0.6	1.1
<i>LST (onsite stationary emissions only)</i>	<i>132</i>	<i>878</i>	<i>3</i>	<i>4</i>
Threshold exceeded?	No	No	No	No
Sources: SCAQMD, Final LST Methodology Document, Appendix C – Mass Rate LST Look-up Tables, Revised October 2009.				

Construction emissions would be temporary and would not be located in the same location for the entire one-year construction period. Sensitive receptors would be exposed to temporary construction air pollution emissions while adjacent pipelines are being actively installed. However, emissions would be less than applicable thresholds and mitigation would not be required.

Carbon monoxide hotspots have the potential to occur in traffic-congested roadways and intersections with poor circulation. The Modified Project would involve minimal operation and maintenance trips. Furthermore, construction-related carbon monoxide emissions would be below SCAQMD regional and LST thresholds (see **Table 3-2** and **Table 3-4**). Therefore, the Modified Project would not have the potential to cause a carbon monoxide hotspot on roadways adjacent to sensitive receptors. Modified Project impacts on sensitive receptors would be less than significant. Therefore, there would be no new impact as a result of the Modified Project and no new mitigation would be required.

Mitigation Measures

None required.

Biological Resources

The following analysis relies on two technical reports prepared by Rincon Consultants, Inc: a Biological Resources Technical Study that was prepared in April 2021 and a Biological Resources Report that was prepared in January 2024.

The 2021 Biological Resources Technical Study was prepared for the Airport Boulevard Sewer Consolidation Project MND. With the exception of 3,000 linear feet of pipeline between Oscar Cruz Water System and Pierce Street, the Modified Project would install potable water pipeline in the same location as the Airport Boulevard Sewer Consolidation Project sewer pipeline within Fillmore Street and Avenue 57 and the Villas De Josue MHP, Leon Housing, Duran's Farms, and Oscar Cruz Water System SWSs. Therefore, the Modified Project components within the four SWSs and along Fillmore Street/Avenue 57 between the intersection with Airport Boulevard and Oscar Cruz Water System are located within the study area of the 2021 Biological Resources Technical Study, as shown **Figure 3-3**. The complete 2021 Biological Resources Technical Study is provided in **Appendix B**.

The Modified Project proposes to extend the water main on Avenue 57 from Oscar Cruz Water System to Pierce Street, which involves installing approximately 3,000 linear feet of 12-inch pipeline. This alignment is outside of the pipeline alignment evaluated in the Airport Boulevard Sewer Consolidation Project MND and is therefore not covered within the 2021 Biological Resources Technical Study area. As a result, the 2024 Biological Resources Report was developed to evaluate this alignment, as shown in **Figure 3-4**. The complete 2024 Biological Resources Report is provided in **Appendix C**.

Figure 3-3: 2021 Biological Resources Technical Study Area

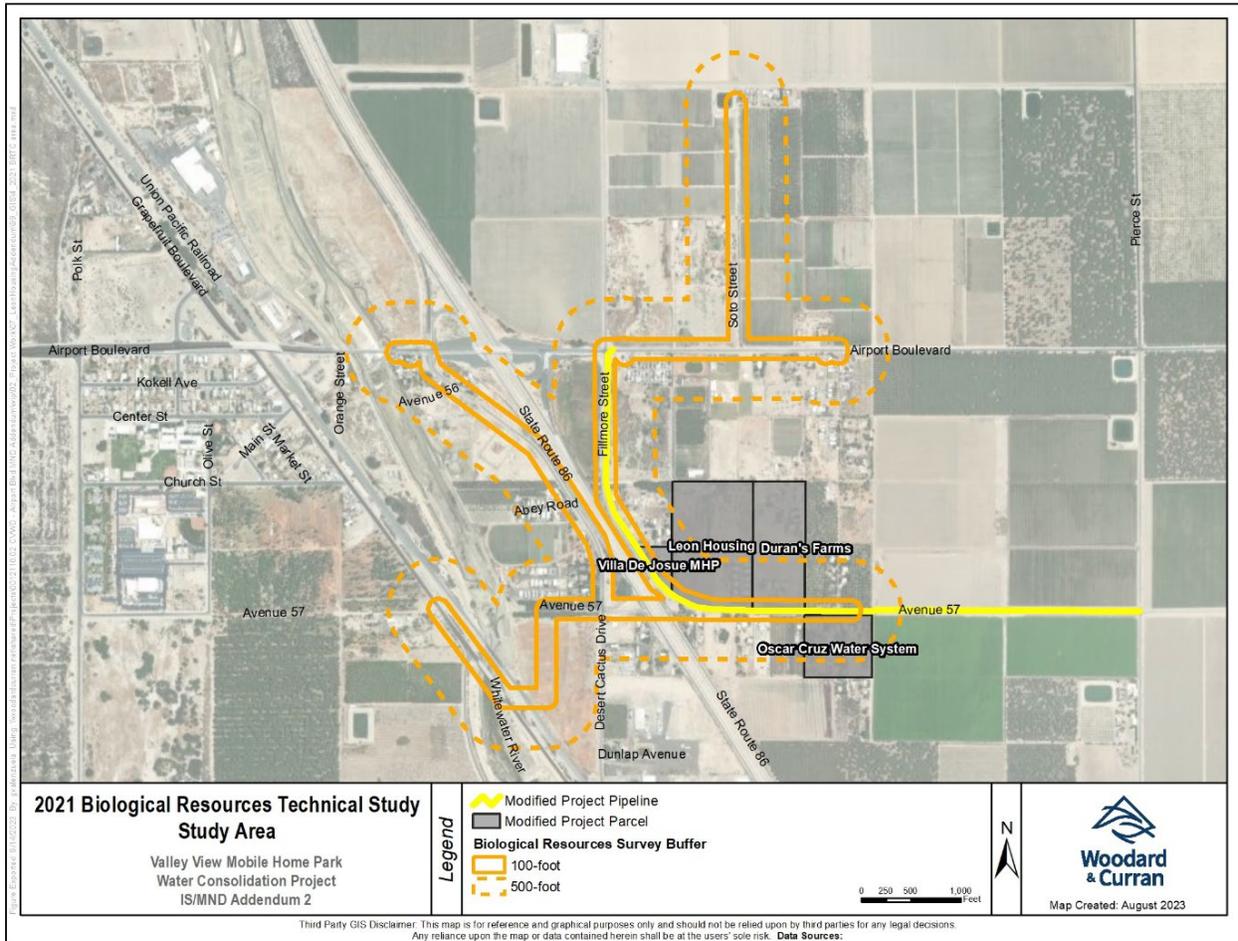
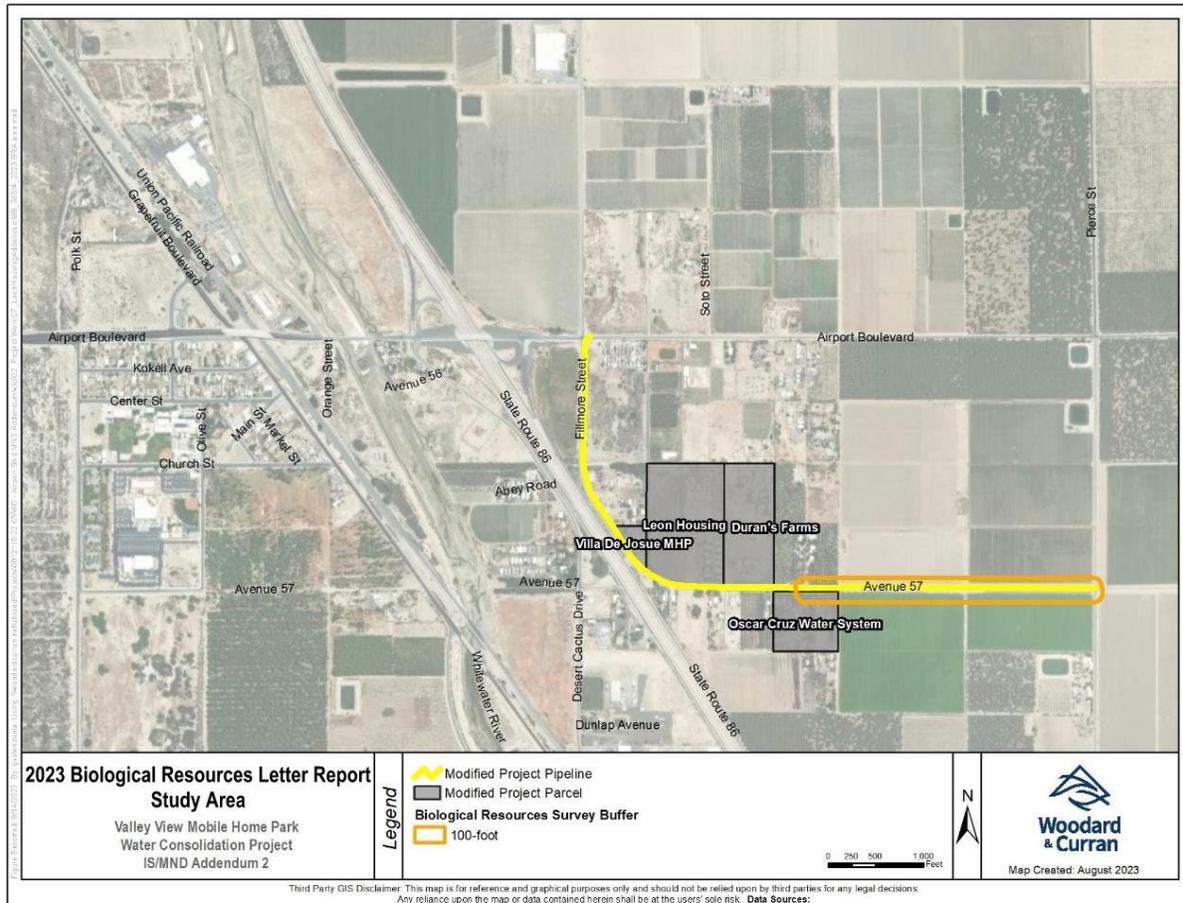


Figure 3-4: 2024 Biological Resources Report Study Area



(a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service

Approved Project

The MND found 43 special status plant species and 26 special status wildlife species were previously recorded within a five-mile radius of the Approved Project area. Although it was determined that the project alignment within existing roadways does not contain suitable habitat to support special status plant species, undeveloped land adjacent to the project was determined to contain marginally suitable habitat for western yellow bat (*Lasiurus xanthinus*), western mastiff bat (*Eumops perotis californicus*), and Burrowing owl (*Athene cunicularia*) and could be impacted by ground disturbance. **Mitigation Measures BIO-1 and BIO-2** would be implemented to reduce the potential to impact any roosting bats or burrowing owls.

In addition, there is habitat within and adjacent to the Approved Project area that is suitable for nesting birds, which are protected by the MBTA and the CFGC (FGC 3503 and 3503.5). If construction activities related to the Approved Project would occur during the nesting season, **Mitigation Measure BIO-3** would be implemented to reduce potential impacts to nesting birds to less than significant levels. Therefore, with implementation of **Mitigation Measures BIO-1, BIO-2 and BIO-3**, direct and indirect impacts to special status wildlife species and nesting birds would be less than significant.

Modified Project

According to the 2021 Biological Resources Technical Study and 2024 Biological Resources Report, construction of the Modified Project would not be expected to impact special status plant or wildlife species because of the lack of suitable habitat within and adjacent to the pipeline alignment. Special status plant species were determined to have little to no potential to occur given the lack of suitable soils, inappropriate hydrologic conditions, and existing disturbance history. Special status wildlife species were determined to have little to no potential to occur due to low habitat quality and frequent disturbance from human activity. Nonetheless, undeveloped land adjacent to the Modified Project was determined to contain marginally suitable habitat for western yellow bat (*Lasiurus xanthinus*), western mastiff bat (*Eumops perotis californicus*), and burrowing owl (*Athene cunicularia*). **Mitigation Measures BIO-1 and BIO-2** from the MND would be implemented to reduce any potential impact to roosting bats or burrowing owls.

Similar to the Approved Project, habitat within and adjacent to the Modified Project may also contain suitable habitat for nesting birds. As a result, the Modified Project has the potential to result in direct impacts on nesting birds through increased injury or mortality, or disruption of normal adult behaviors resulting in the abandonment or harm to eggs and nestlings if construction activities would be required during the nesting season (January 1 through July 1 for raptors, February 1 through August 31 for burrowing owl, and March 1 through September 15 for passerines). Construction also has the potential to result in indirect impacts resulting from noise and dust. **Mitigation Measure BIO-3** from the MND would be implemented to reduce potential direct and indirect impacts on nesting birds to less than significant. Therefore, with implementation of **Mitigation Measures BIO-1, BIO-2, and BIO-3**, direct and indirect impacts on special status wildlife species and nesting birds would be less than significant. No new impact would occur as a result of the Modified Project, and no new mitigation would be required.

(b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service

Approved Project

The MND determined no sensitive vegetation communities have been recorded within a five-mile radius of the Approved Project area. The project alignment is located primarily within developed urban and agricultural areas and no sensitive vegetation communities were observed within or adjacent to the project alignment. Furthermore, project impacts

would be limited to previously disturbed areas, such as within roadway rights-of-way and on private, developed properties, with high human activity. Therefore, potential impacts to sensitive vegetation communities would be less than significant.

Modified Project

Similar to the Approved Project, land cover within the Modified Project area is primarily developed urban and agricultural areas. According to the 2021 Biological Resources Technical Study and 2024 Biological Resources Report, no sensitive vegetation communities were identified within the Modified Project alignment's biological survey area. The Modified Project area does not contain riparian habitat or other sensitive natural communities which could be impacted by construction activities. Therefore, no new impacts would occur, and no new mitigation would be required.

(c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means

Approved Project

Although a majority of the pipelines evaluated in the MND are within existing roadways, a segment of the Approved Project intersects the Coachella Valley Stormwater Channel, which is potentially subject to United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW) jurisdiction. While impacts to the Coachella Valley Stormwater Channel have been avoided through the project design and permitting compliance process, adherence to **Mitigation Measure BIO-4**, which includes preparation of a Frac-Out Prevention and Contingency Plan, would also ensure potential indirect impacts to jurisdictional waters are minimized. In addition, the project contractor would be required to obtain and comply with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit requirements, and CVWD would obtain a Lake and Streambed Alteration Agreement (SAA) from the CDFW. Based on the project design, avoidance of the Coachella Valley Stormwater Channel, implementation of BMPs for pollution prevention, implementation of **Mitigation Measure BIO-4**, and adherence to the measures in the SAA, potential impacts to jurisdictional waters and wetlands would be less than significant.

Modified Project

The Modified Project area consists of an existing paved road, moderately well-drained soils, and developed land for agriculture and residential use which could not support riparian/riverine habitat, vernal pools, fairy shrimp habitat, or jurisdictional waters and wetlands. The Modified Project would not cross or be located within any jurisdictional features and no jurisdictional permits would be required. The Modified Project would not be required to prepare a Frac-Out Prevention and Contingency Plan or obtain an SAA from the CDFW. As part of project design and described in *Section 2.4.5 Construction Best Management Practices*, a SWPPP requiring implementation of construction site

BMPs would be developed to ensure the control of runoff and sedimentation during construction. No impacts would occur to state or federally protected wetlands or other potentially jurisdictional features, and no new mitigation would be required.

(d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites

Approved Project

The MND determined the Approved Project footprint is mostly located within previously developed and disturbed areas that offer little to no value to wildlife movement, and direct impacts to wildlife movement as a result of project implementation would be less than significant.

However, trenchless construction under the Coachella Valley Stormwater Channel may require a limited amount of overnight work involving the use of floodlighting to prevent bore hole collapse. As such, **Mitigation Measure BIO-5** is recommended to reduce indirect wildlife movement impacts from floodlighting. Therefore, with implementation of **Mitigation Measure BIO-5**, the Approved Project would not inhibit wildlife movement and would have a less than significant impact.

Modified Project

Similar to the Approved Project, the Modified Project would not be located within or adjacent to a natural landscape block or an essential habitat connectivity corridor and would not result in habitat fragmentation. Furthermore, the Modified Project would not involve nighttime work and, therefore, would not be required to mitigate the potential impacts from floodlighting. Therefore, no new impact would occur, and no new mitigation would be required.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Approved Project

The MND determined no protected trees would be removed due to construction of the Approved Project and the project would not conflict with Riverside County Ordinance 559, Regulating the Removal of Trees.

However, the MND identified that the Coachella Valley Stormwater Channel Improvement Project – Avenue 54 to Thermal Drop Structure Project has a mitigation site that is located approximately 550 feet upstream of the Approved Project alignment that is subject to preservation and long-term management (vegetation management and invasive species control). Adherence to **Mitigation Measure BIO-6** would ensure construction of the Approved Project would avoid the Coachella Valley Stormwater Channel Improvement Project mitigation site and in the event of unforeseen impacts to the mitigation site, the site shall be restored to ensure existing mitigation obligations are fulfilled. Therefore, with

implementation of **Mitigation Measure BIO-6**, the Approved Project would not conflict with any local policy or ordinance protecting biological resources and would have a less than significant impact.

Modified Project

Similar to the Approved Project, the Modified Project area does not contain any trees that meet the criteria of protected under the Riverside County Ordinance 559. In addition, construction of the Modified Project would not be within or adjacent to the Coachella Valley Stormwater Channel and would have no potential to impact the Coachella Valley Stormwater Channel Improvement Project – Avenue 54 to Thermal Drop Structure Project mitigation site. Therefore, the Modified Project would not conflict with any local policy or ordinance. No impact would occur, and no new mitigation would be required.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Approved Project

The MND found that the Approved Project area is within the CVMSHCP plan area; however, it is not within a designated Conservation Area and no CVMSHCP-covered or otherwise special-status species have a potential to occur within the Approved Project area. As a permittee in the CVMSHCP, CVWD mitigates its development impact to parcels outside of the Conservation Areas but within the CVMSHCP plan boundaries through compliance with the Local Development Mitigation Fee guidelines; however, the Approved Project area does not permanently impact any undisturbed vacant parcels that would be applicable. Therefore, the Approved Project would have no impact.

Modified Project

According to the 2021 Biological Resources Technical Study and 2024 Biological Resources Report, the Modified Project is also within the CVMSHCP plan area but not within a designated Conservation Area. No CVMSHCP-covered or otherwise special-status species, with the exception of burrowing owl, have a potential to occur within the Modified Project area. **Mitigation Measure BIO-2** from the MND would be implemented to reduce any potential impact to burrowing owls. Therefore, with implementation of **Mitigation Measure BIO-2**, the Modified Project would not significantly conflict with the CVMSHCP objectives and impacts would be less than significant. No new impact would occur as a result of the Modified Project, and no new mitigation would be required.

Mitigation Measures

To mitigate possible impacts to biological resources, CVWD shall implement **Mitigation Measures BIO-1, BIO-2, and BIO-3** which were previously adopted in the MND for the Approved Project. The impacts of the Modified Project are the same as the Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

Cultural Resources

The following analysis relies on two technical reports prepared by Rincon Consultants, Inc: a Cultural Resources Technical Report that was prepared in April 2021 and a Historic Property Inventory Report that was prepared in January 2024.

The 2021 Cultural Resources Technical Report was prepared for the Airport Boulevard Sewer Consolidation Project MND. The Modified Project would install potable water pipeline using the same construction method and equipment as the sewer pipeline described in the Airport Boulevard Sewer Consolidation Project MND. Additionally, the Modified Project would require installation within Fillmore Street and Avenue 57 and the Villas De Josue MHP, Leon Housing, Duran's Farms, and Oscar Cruz Water System SWSs, similar to the sewer pipeline described in the Airport Boulevard Sewer Consolidation Project MND. Therefore, the Modified Project components within the four SWSs and along Fillmore Street/Avenue 57 between the intersection with Airport Boulevard and Oscar Cruz Water System SWS are located within the study area of the 2021 Cultural Resources Technical Report. The complete 2021 Cultural Resources Technical Report is provided in **Appendix D**.

The Modified Project proposes to extend the water main on Avenue 57 from Oscar Cruz Water System to Pierce Street, which involves installing approximately 3,000 linear feet of 12-inch pipeline. This alignment is outside of the pipeline alignment evaluated in the Airport Boulevard Sewer Consolidation Project MND and is therefore not covered within the 2021 Cultural Resources Technical Report study area. As a result, the 2024 Historic Property Inventory Report was developed to evaluate this alignment. The complete 2024 Historic Property Inventory Report is provided in **Appendix E**.

(a-c) Cause a substantial adverse change in the significance of a historical or unique archaeological resource pursuant to Section 15064.5 or disturb any human remains, including those interred outside of dedicated cemeteries

Approved Project

The MND found that although 26 cultural resources have been recorded within one-half-mile of the Approved Project area, no previously recorded cultural resources are located or were observed within the Approved Project sites. While the archaeological sensitivity of the project area is considered low based on the records search, there is potential for ground-disturbing activities to expose previously unrecorded cultural resources. Implementation of **Mitigation Measure CUL-1** would require the initial ground-disturbing

activities be observed by an archaeological and Native American monitor. Implementation of **Mitigation Measure CUL-2** would require that all earth disturbing work be temporarily suspended if cultural resources are discovered during construction. Implementation of **Mitigation Measure CUL-3** would ensure proper procedure would be in place if human remains were unearthed during construction activities. With implementation of **Mitigation Measures CUL-1, CUL-2, and CUL-3**, the potential impacts resulting in a substantial adverse change to the significance of historical and/or archeological resources would be reduced to less than- significant levels.

Modified Project

According to the cultural resource assessments, construction of the Modified Project would have no impact to historic resources. Proposed pipeline within Fillmore Street and Avenue 57 would be installed within the existing right-of-way. New on-property distribution piping, if needed, would be installed in the same location as existing distribution piping, where possible and would have no impact on existing structures. The 2024 Historic Property Inventory Report found a historic-age electrical/ telecommunications utility line within the Area of Potential Effects (APE) along the south side of Avenue 57. Given that the segment of the utility line within the APE is not unique in its design, is only a small segment of a much larger utility line that extends beyond the APE and would not be physically altered by the Modified Project, the utility line segment was determined to be insignificant in the Historic Property Inventory Report. Construction of the Modified Project would have a low to moderate likelihood of impacting buried archaeological resources based on the level of existing development and disturbance within and adjacent to the Modified Project alignment. However, the lack of known surface archaeological sites does not preclude the existence of subsurface resources, and although the range of disturbance within the upper layers of the Modified Project area is considered moderate to high, the deeper levels have the potential to contain less disturbed native soils. In addition, the project area is considered archaeologically sensitive based on concerns raised by the Torres Martinez Desert Cahuilla Indians and Agua Caliente Band of Cahuilla Indians based on the presence of a village site in the vicinity of the Modified Project area. Therefore, similar to the Approved Project, there is potential for ground-disturbing activities to expose previously unrecorded cultural resources. Implementation of **Mitigation Measures CUL-1** through **CUL-3** from the MND would ensure no new impact would occur and no additional mitigation measures would be needed.

Mitigation Measures:

To mitigate possible impacts to cultural resources, CVWD shall implement **Mitigation Measures CUL-1, CUL-2, and CUL-3** which were previously adopted in the MND for the Approved Project. The impacts of the Modified Project are the same as the Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

Hazards and Hazardous Materials

As explained in *Section 1.4 Evaluation of Environmental Impacts*, resource areas that were found to have No Impact or Less than Significant Impact in the MND, and for which the Modified Project would also result in a finding of No Impact or Less than Significant Impact, are not analyzed further in this Addendum. This includes checklist questions (a), (c), (e), and (g) under Hazards and Hazardous Materials. The resource areas under checklist questions (b), (d), and (f) are analyzed.

(b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment

Approved Project

The MND found that construction of the Approved Project has the potential to create a hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials (e.g., gasoline, diesel fuel, hydraulic fluids, paint) into the environment. Implementation of **Mitigation Measure HAZ-1** would require the construction contractor to develop and implement a Hazardous Materials Management Spill Prevention and Control Plan that includes project-specific contingencies. The risk of spills related to hazardous materials that may be transported or used during routine maintenance would be minimized through following existing CVWD protocols for maintenance activities at its existing facilities. Therefore, impacts from hazardous materials to the public or the environment from potential accidents would be reduced to a less-than-significant level with the implementation of **Mitigation Measure HAZ-1**.

Modified Project

The Modified Project involves the same method of pipeline construction as the Approved Project. Therefore, no changes in impact type or severity are anticipated. The Modified Project would also implement **Mitigation Measure HAZ-1**, which was previously adopted as part of the MND, to minimize the risk of hazardous material exposure during construction. Furthermore, similar to the Approved Project, the risk of hazardous materials release during operation of the Modified Project would be minimized by following existing CVWD protocols for maintenance activities. Impacts of the Modified Project would be comparable to those of the Approved Project with the implementation of previously adopted **Mitigation Measure HAZ-1**. Therefore, no new impact would occur, and no new mitigation would be required.

(d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment

Approved Project

A regulatory records search was conducted for the Approved Project area using the State Water Resource's Control Board (SWRCB)'s GeoTracker and the California Department of Toxic Substances Control (DTSC)'s EnviroStor databases and did not indicate the presence of active hazardous materials cleanup sites within the Approved Project area. Therefore, construction and operation associated with the Approved Project would not create a significant hazard to the public or the environment through the release of existing materials related to a listed hazardous materials site. Impacts would be less than significant, and no mitigation would be required.

Modified Project

A regulatory records search of the SWRCB GeoTracker (SWRCB 2023) and DTSC's EnviroStor (DTSC 2023) databases was performed for the Modified Project area on August 29, 2023. There are no active cleanup sites within one mile of the Modified Project area. There are no hazardous sites listed on the EnviroStor database within one mile of the Modified Project. There are no active hazardous materials cleanup sites within the Modified Project area. As a result, no new impacts would occur, and no new mitigation would be required.

(f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan

Approved Project

The MND determined construction of the Approved Project would temporarily block access to roadways and driveways that are currently used by emergency response vehicles or in emergency evacuations. Implementation of **Mitigation Measure TRA-1** would ensure communication with emergency response agencies to develop emergency access strategies in a traffic control plan. Operation of the Approved Project would not physically impair or otherwise interfere with emergency response or evacuation in the project vicinity. Thus, impacts would be less than significant with mitigation.

Modified Project

Similar to the Approved Project, Project construction would temporarily block access to roadways and driveways that are currently used by emergency response vehicles or in emergency evacuations. As a result, the Modified Project would implement **Mitigation Measure TRA-1**, which was previously adopted as part of the MND, to minimize potential impacts to an emergency response or an emergency evacuation plan. Long term, the Modified Project would not physically impair or otherwise interfere with emergency response or evacuation in the project vicinity as the majority of the project components would be located below-grade and ground surfaces would be returned to pre-construction

conditions. Therefore, no new impact would occur, and no new mitigation would be required.

Mitigation Measures

To mitigate unanticipated exposure to hazardous materials and physical interference with evacuations and emergencies during construction and operation, CVWD shall implement **Mitigation Measure HAZ-1** and **TRA-1** which were previously adopted in the MND for the Approved Project. Impacts of the Modified Project are the same as the Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

Hydrology and Water Quality

As explained in *Section 1.4 Evaluation of Environmental Impacts*, resource areas that were found to have No Impact or Less than Significant Impact in the MND, and for which the Modified Project would also result in a finding of No Impact or Less than Significant Impact, are not analyzed further in this Addendum. This includes checklist questions (b), (c), and (e) under Hydrology and Water Quality. The resource areas under checklist questions (a) and (d) are analyzed.

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Approved Project

Construction of the Approved Project could result in short-term erosion/sedimentation that has the potential to impact water quality. Because of the Approved Project size (over one-acre of land disturbance), the project contractor would be required to obtain a NPDES General Permit for Discharges of Storm Water Associated with Construction Activity - Construction General Permit (Order 2009-0009- DWQ). Coverage under the SWRCB's Construction General Permit requires preparation and implementation of a SWPPP containing BMPs to control sediment and other construction-related pollutants in storm water discharges.

Installation of the transmission pipe under the Coachella Valley Stormwater Channel would require trenchless HDD methods, which has the potential to impact water quality within the channel if the bentonite drilling fluid were to accidentally leak (i.e., "frac-out") or otherwise run off into the channel. Implementation of **Mitigation Measure BIO-4** would require the HDD contractor to develop and implement a Frac-Out Prevention and Contingency Plan. With implementation of **Mitigation Measure BIO-4**, the SWPPP, and the CDFW SAA, the Approved Project would not violate water quality standards or waste discharge requirements or otherwise degrade surface or groundwater quality. Impacts would be less than significant.

Modified Project

Similar to the Approved Project, construction of the Modified Project could result in short-term erosion/sedimentation that has the potential to impact water quality. As discussed in *Section 2.4.5 Construction Best Management Practices*, construction of the Modified Project would require coverage under the SWRCB's NPDES Construction General Permit, which would require development of a construction SWPPP and implementation of BMPs to prevent polluted runoff from leaving the construction site. However, the Modified Project does not require trenchless construction and would not be required to implement a Frac-Out Prevention and Contingency Plan. With implementation of the SWPPP, storm water discharges from the Modified Project site during construction are not expected to violate existing water quality standards or waste discharge requirements set by the RWQCB. No surface water or groundwater quality impacts would occur during operation of the Modified Project because it would not result in permanently disturbed areas or production of material that could enter waterways. Therefore, the Modified Project would not be expected to violate water quality standards or waste discharge requirements or otherwise degrade surface or groundwater quality because it would comply with all existing regulations and permits. No new impact would occur, and no new mitigation would be required.

(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation

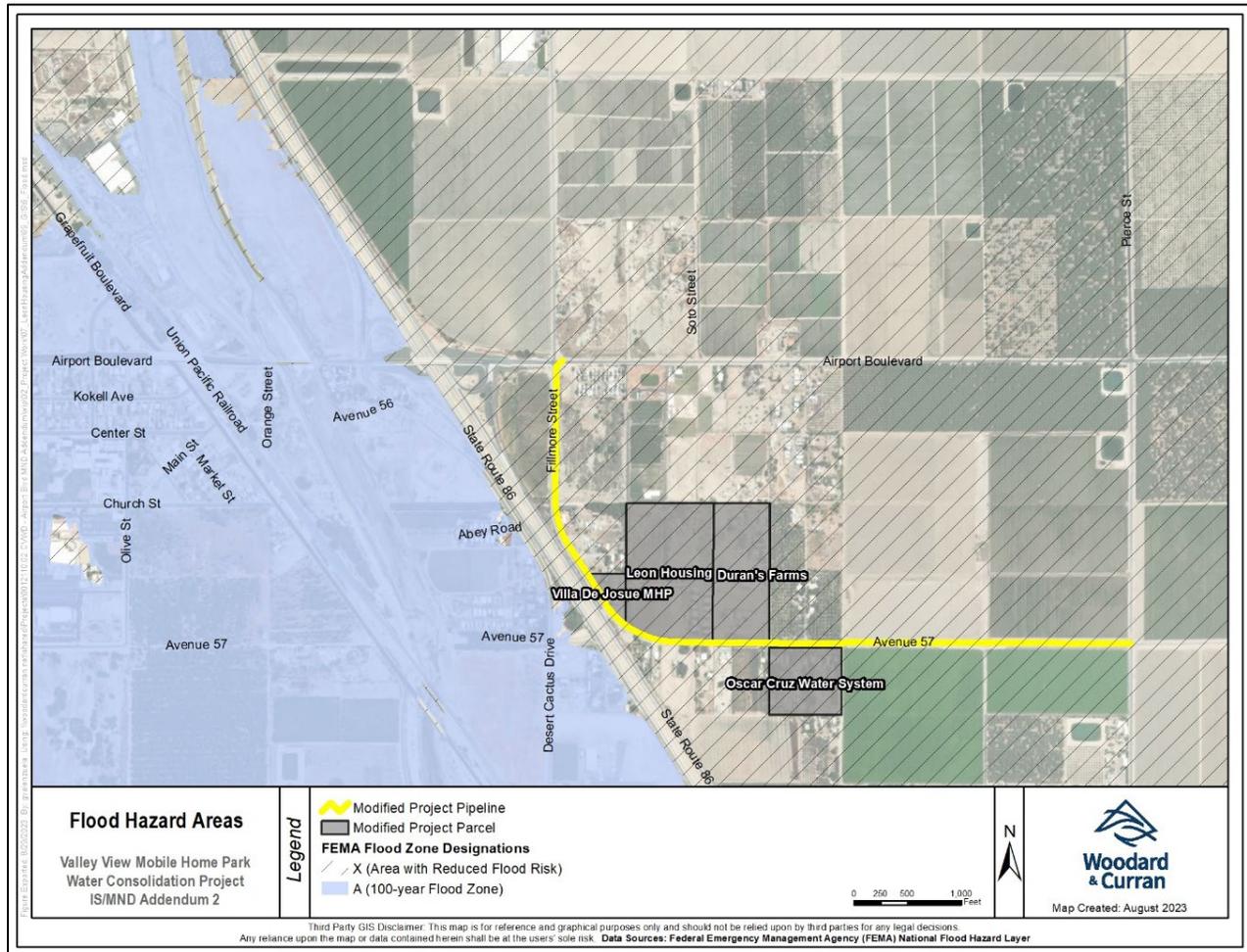
Approved Project

The MND found that the Approved Project would unlikely become inundated by flood, seiche or tsunami and the potential for release of pollutants is low. The Approved Project area is located approximately 80 miles from the Pacific Ocean, approximately 60 miles from Lake Perris and Lake Elsinore, and 10 miles from the Salton Sea. Lake Perris, Lake Elsinore, and the Salton Sea have the potential for a damaging seiche to be seismically generated, but the impacts would be in the immediate vicinity of the water bodies and the Approved Project area is far from the immediate impact area of each water body. In addition, the only portion of the Approved Project located in a flood hazard zone is the Coachella Valley Stormwater Channel crossing, and this portion would be installed on an existing bridge. For these reasons, the risk of pollutant release from flood, tsunami, or seiche is low and impacts are less than significant.

Modified Project

The Modified Project is similarly unlikely to become inundated by seiche or tsunami given the distance from the Pacific Ocean, Lake Perris, Lake Elsinore, and the Salton Sea. As shown in **Figure 3-5**, the Modified Project area is not located within or directly adjacent to a Federal Emergency Management Agency (FEMA) 100 or 500-year flood zone (FEMA 2021). In addition, there is no associated risk of floods inundating pipelines because they would be installed below-ground and the potential for release of pollutants is low. Therefore, there would be no new impacts as a result of the Modified Project and no new mitigation would be required.

Figure 3-5: Flood Hazard Areas



Mitigation Measures

None required.

Land Use and Planning

As explained in *Section 1.4 Evaluation of Environmental Impacts*, resource areas that were found to have No Impact or Less than Significant Impact in the MND, and for which the Modified Project would also result in a finding of No Impact or Less than Significant Impact, are not analyzed further in this Addendum. This includes checklist question (a) under Land Use and Planning. The resource area under checklist question (b) is analyzed.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Approved Project

The Approved Project would be installed below-grade within roadway rights-of-way and on public and private lands and would comply with Riverside County's land use policies and regulations and all applicable permits and approvals. All surfaces would be restored to pre-construction conditions upon completion of construction. Therefore, it would not conflict with applicable land use plans, policies, and regulations of agencies with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect.

The Coachella Valley Stormwater Channel Improvement Project – Avenue 54 to Thermal Drop Structure Project has a mitigation site that is located approximately 550 feet upstream of the Airport Boulevard bridge and encompasses streambed and stream-associated habitat. Adherence to **Mitigation Measure BIO-6** would ensure construction of the Approved Project would avoid the Coachella Valley Stormwater Channel Improvement Project mitigation site and in the event of unforeseen impacts to the mitigation site, the site shall be restored to ensure existing mitigation obligations are fulfilled. With mitigation, impacts would be less than significant.

Modified Project

Similar to the Approved Project, the Modified Project would install below-grade pipelines and would comply with all applicable permits and approvals identified in *Section 2.5 Permits and Approvals*. All surfaces would be restored to pre-construction conditions upon completion of construction. However, construction of the Modified Project would not occur within or near the Coachella Valley Stormwater Channel. Thus, the Modified Project would not be required to avoid the Coachella Valley Stormwater Channel Improvement Project mitigation site or, in the event of unforeseen impacts to the mitigation site, restore the site to ensure existing mitigation obligations are fulfilled. Therefore, the Modified Project would be consistent with all applicable land use plans, policies, and regulations of agencies with jurisdiction over the Modified Project adopted for the purpose of avoiding or mitigating an environmental effect. There would be no new impacts as a result of the Modified Project and no new mitigation would be required.

Mitigation Measures:

None required.

Noise

As explained in *Section 1.4 Evaluation of Environmental Impacts*, resource areas that were found to have No Impact or Less than Significant Impact in the MND, and for which the Modified Project would also result in a finding of No Impact or Less than Significant Impact, are not analyzed further in this Addendum. This includes checklist questions (c) under Noise. The resource area under checklist questions (a) and (b) area analyzed.

(a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies

Approved Project

Construction of the Approved Project has the potential to expose persons to noise resulting from construction activities and operations. Noise within the County of Riverside is regulated under the County's Noise Ordinance 847 and acceptable noise levels are established in the County's General Plan. Construction would result in temporary and periodic noise increases and noise levels would fluctuate depending on the construction phase, equipment type, and duration of use; distance between noise source and receptor; and presence or absence of existing barriers between noise source and receptor. In addition, truck traffic could generate excessive noise to residences adjacent to construction areas and along haul routes. This impact would be reduced to a less-than-significant level with the implementation of **Mitigation Measure NOI-1**, which requires the construction contractor to implement the best available noise control techniques and equipment.

Once operational, the pipelines are not expected to result in a permanent increase in noise, other than noise associated with occasional vehicle maintenance trips. Therefore, the Approved Project would have less-than-significant long-term noise impacts with implementation of **Mitigation Measure NOI-1**.

Modified Project

Similar to the Approved Project, the Modified Project has the potential to expose persons to noise resulting from temporary construction activities. As described within *Section 2.4.2 Construction Equipment and Staging*, the construction equipment required for the Modified Project would be the same as that listed in the Approved MND for open cut pipeline installation. Truck trips and equipment use associated with construction of the Modified Project would be comparable to the Approved Project and have the potential to impact noise-sensitive land uses adjacent to construction areas and haul routes. Therefore, the potential for noise generation during construction of the Modified Project is similar to that of the Approved Project. **Mitigation Measure NOI-1**, which requires the construction contractor to implement construction noise reduction measures and was previously adopted as part of the MND, would apply to the Modified Project. With implementation of the same mitigation specified in the MND, temporary construction noise impacts associated with the Modified Project would be similar to the impacts of the Approved Project. There would be no new impacts as a result of the Modified Project and no new mitigation would be required.

Operation of the Modified Project would not differ from operation of the Approved Project. Pipeline operation would not generate noise impacts associated with occasional maintenance vehicle trips beyond those impacts analyzed in the MND. Therefore, the permanent ambient noise impact from operation of the Modified Project would remain

less than significant. There would be no new impacts as a result of the Modified Project and no new mitigation would be required.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Approved Project

Construction of the Approved Project has the potential to cause groundborne vibration and groundborne noise. Although groundborne vibration from construction of the project is expected to attenuate to reach a less than significant level by the time it reaches the nearest sensitive receptors, implementation of the groundborne vibration control measures in **Mitigation Measure NOI-1** would ensure construction-related vibration levels would be reduced to less than significant.

Once operational, the Approved Project pipeline would be below-ground and is not expected to result in a permanent source of groundborne vibration. Vehicles associated with occasional maintenance trips would have minimal vibration impacts. Operational vehicle maintenance trips would occur during daytime hours, consistent with the Riverside County Noise Ordinance and City of Coachella Municipal Code. Therefore, the Approved pipeline would have less than significant long-term vibration impacts.

Modified Project

Similar to the Approved Project, construction of the Modified Project has the potential to cause groundborne vibration and groundborne noise. As described within *Section 2.4.2 Construction Equipment and Staging*, the construction equipment required for the Modified Project would be the same as that listed in the Approved MND for open cut pipeline installation. Therefore, the potential to generate groundborne vibration and groundborne noise during construction of the Modified Project is similar to that of the Approved Project. While construction related impacts would also be expected to attenuate to less than significant, implementation of **Mitigation Measure NOI-1** would ensure impacts would be reduced to less than significant.

Operation of the Modified Project would be the same as the Approved Project and would also have less than significant long term vibration impacts. With implementation of **Mitigation Measure NOI-1**, construction and operational impacts associated with groundborne vibrations and noise would be less than significant.

Mitigation Measures

To mitigate possible temporary construction noise impacts of the Modified Project, CVWD shall implement **Mitigation Measure NOI-1** which was previously adopted in the MND for the Approved Project. Impacts of the Modified Project are the same as the Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

Transportation

As explained in *Section 1.4 Evaluation of Environmental Impacts*, resource areas that were found to have No Impact or Less than Significant Impact in the MND, and for which the Modified Project would also result in a finding of No Impact or Less than Significant Impact, are not analyzed further in this Addendum. This includes checklist questions (b) and (c) under Transportation. The resource areas under checklist questions (a) and (d) are analyzed.

(a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities

Approved Project

The MND found that construction of the Approved Project would not conflict with regional transportation plans, including the Riverside County Transportation Commission's Congestion Management Program, the Coachella Valley Association of Government's studies, or the Southern California Association of Government's Regional Transportation Plan/Sustainable Communities Strategy. Construction would be temporary, and potential traffic-related impacts would not occur in the same location over the construction period but would rather move along the pipeline alignment. All disturbed areas would be restored to original grade. As such, temporary construction is not expected to have a significant impact on traffic. However, although construction-related traffic impacts would be temporary, individual traffic lane closures may be necessary and the Approved Project would be required to comply with a County-approved Traffic Control Plan. To ensure the appropriate traffic controls are implemented and potential traffic impacts related to lane closures are less than significant, the Approved Project shall implement **Mitigation Measure TRA-1**. Operation of the Approved Project would not have a permanent impact on circulation. Therefore, the MND found that coordination with emergency responders and development of an approved Traffic Control Plan through implementation of **Mitigation Measure TRA-1** would reduce potential traffic impacts associated with closures and detours to less than significant.

Modified Project

Similar to the Approved Project, construction of the Modified Project would also require temporary lane closures. **Mitigation Measure TRA-1**, which requires the construction contractor to implement an approved Traffic Control Plan and was previously adopted as part of the MND, would also apply to the Modified Project. With implementation of the same mitigation specified in the MND, temporary traffic impacts associated with the Modified Project would be less than significant, similar to the impacts of the Approved Project.

Operation of the Modified Project would not differ from operation of the Approved Project. Once operational, the Modified Project would not conflict with regional transportation plans because it would install below-ground pipelines that would not create any permanent impact to existing roadways or an increase in the number of service vehicles

in use. CVWD would continue to operate its potable water system with no operational modifications using standard vehicles. Long-term impacts on the circulation system plans from operation of the Modified Project would remain less than significant. There would be no new impacts as a result of the Modified Project and no new mitigation would be required.

(d) Result in inadequate emergency access

Approved Project

Construction of the Approved Project may require temporary lane closures that have the potential to hinder emergency vehicle access. In order to prevent construction from interfering with emergency responders, implementation of **Mitigation Measure TRA-1** would require CVWD's Project Manager to coordinate with police, fire, and other emergency services to alert these entities about potential construction delays, project alignment, and construction schedule. CVWD would also be required to minimize the duration of disruptions/closures to roadways and critical access points for emergency services. With implementation of **Mitigation Measure TRA-1**, impacts would be reduced to less than significant.

Modified Project

Construction activities of the Modified Project would be consistent with those analyzed in the MND and may require lane closures that could temporarily hinder emergency vehicle access. Implementation of **Mitigation Measure TRA-1**, which was previously adopted as part of the MND, would require emergency crews to be informed of potential construction delays or lane closures. Implementation of the previously adopted **Mitigation Measure TRA-1** would reduce potential impacts to less than significant. Therefore, there would be no new impacts as a result of the Modified Project and no new mitigation would be required.

Mitigation Measures

To mitigate possible impacts to circulation and emergency access during construction, CVWD shall implement **Mitigation Measure TRA-1**, which was previously adopted in the MND for the Approved Project. The Modified Project impacts are the same as the Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

Tribal Cultural Resources

The following analysis relies on two technical reports prepared by Rincon Consultants, Inc: a Cultural Resources Technical Report that was prepared in April 2021 and a Historic Property Inventory Report that was prepared in January 2024.

The 2021 Cultural Resources Technical Report was prepared for the Airport Boulevard Sewer Consolidation Project MND. The Modified Project would install potable water pipeline using the same construction method and equipment as the Airport Boulevard

Sewer Consolidation Project sewer pipeline installation within Fillmore Street, Avenue 57 and the Villas De Josue MHP, Leon Housing, Duran's Farms, and Oscar Cruz Water System SWSs. Therefore, the Modified Project components within the four SWSs and along Fillmore Street/Avenue 57 between the intersection with Airport Boulevard and Oscar Cruz Water System SWS are located within the study area of the 2021 Cultural Resources Technical Report. The complete 2021 Cultural Resources Technical Report is provided in **Appendix D**.

The Modified Project proposes to extend the water main on Avenue 57 from Oscar Cruz Water System to Pierce Street, which involves installing approximately 3,000 linear feet of 12-inch pipeline. This alignment is outside of the pipeline alignment evaluated in the Airport Boulevard Sewer Consolidation Project MND and is therefore not covered within the 2021 Cultural Resources Technical Report study area. As a result, the 2024 Historic Property Inventory Report was developed to evaluate this alignment. The complete 2024 Historic Property Inventory Report is provided in **Appendix E**.

(a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe

Approved Project

The MND found no tribal cultural resources have been recorded or identified within the Approved Project area. Much of the Approved Project area has been previously disturbed and therefore the possibility of encountering intact surface tribal cultural resources is considered low. Nonetheless, construction requires ground-disturbing activities such as excavation which has the potential to expose previously unrecorded tribal cultural resources. The Cultural Resources Assessment Report found that no recorded tribal cultural resources have been identified within the Airport Boulevard Project area. However, although no tribal cultural resources were identified that would be directly impacted, two tribes indicated the presence of a village in the vicinity of the Airport Boulevard Sewer Consolidation Project area of potential effects (APE), located approximately 1.25 miles west of the APE (CA-RIV-148). Although the village site is outside of the Approved Project area, the use-area of the village likely spans several square miles. Implementation of **Mitigation Measure CUL-1** would require the initial ground-disturbing activities be observed by an archaeological and Native American monitor. Implementation of **Mitigation Measure CUL-2** would require that all earth disturbing work be temporarily suspended if cultural resources, including tribal cultural

resources, are discovered during construction. Implementation of **Mitigation Measure CUL-3** would ensure proper procedures are in place if human remains were unearthed during construction activities. With implementation of **Mitigation Measures CUL-1, CUL-2** and **CUL-3** potential impacts resulting in a substantial adverse change to the significance of tribal cultural resources would be reduced to less than significant.

Modified Project

Cultural resources assessment of the Modified Project consists of a Cultural Resources Technical Report that was prepared in April 2021 and a Historic Property Inventory Report that was prepared in January 2024 by Rincon Consultants, Inc. These two documents identify potential impacts to cultural resources, including tribal cultural resources, that would result from the Modified Project. Results from the cultural record searches and field surveys concluded that no recorded tribal cultural resources have been identified within the Modified Project alignment. However, the lack of known surface archaeological sites does not preclude the existence of subsurface resources, and the Modified Project area is considered archaeologically sensitive based on concerns raised by the Torres Martinez Desert Cahuilla Indians and Agua Caliente Band of Cahuilla Indians and the presence of a village site, located approximately 1.25 miles west of the Modified Project alignment (CA-RIV-148). Although the village site is outside of the Modified Project area, the use-area of the village likely spans several square miles.

Although the range of disturbance within the upper layers of the Modified Project area is considered moderate to high given previous development of roads and agricultural fields, the deeper levels have the potential to contain less disturbed native soils. For construction projects that require excavation, such as the Modified Project, there is potential for ground-disturbing activities to expose previously unrecorded tribal cultural resources. Tribal responses indicated the potential for tribal cultural resources within the Modified Project area, and mitigation is required to reduce the risk of impacts to these resources if encountered. As such, the Modified Project area is sensitive for archaeological resources, and **Mitigation Measures CUL-1** and **CUL-2** would be implemented. **Mitigation Measure CUL-1** would require the initial ground-disturbing activities be observed by an archaeological and Native American monitor and temporary halting of work if resources are encountered. **Mitigation Measure CUL-2** would require that all earth disturbing work be temporarily suspended if cultural resources, including tribal cultural resources, are discovered during construction.

The discovery of human remains is a possibility during ground disturbing activities. **Mitigation Measure CUL-3** would be implemented to ensure proper procedures would be in place if human remains were unearthed during construction activities. The implementation of this measure would reduce impacts to less-than-significant levels.

With implementation of **Mitigation Measures CUL-1, CUL-2** and **CUL-3**, potential impacts resulting in a substantial adverse change to the significance of tribal cultural resources would be reduced to less than significant.

Mitigation Measures

To mitigate possible impacts to tribal cultural resources, CVWD shall implement **Mitigation Measures CUL-1, CUL-2, and CUL-3** which were previously adopted in the MND for the Approved Project. The impacts of the Modified Project are the same as the Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

Wildfire

As explained in *Section 1.4 Evaluation of Environmental Impacts*, resource areas that were found to have No Impact or Less than Significant Impact in the MND, and for which the Modified Project would also result in a finding of No Impact or Less than Significant Impact, are not analyzed further in this Addendum. This includes checklist questions (b), (c), and (d) under Wildfire. The resource area under checklist question (a) is analyzed.

(a) Substantially impair an adopted emergency response plan or emergency evacuation plan

Approved Project

The MND found that construction of the Approved Project would temporarily block access to roadways and driveways that are currently used by emergency response vehicles or in emergency evacuations. **Mitigation Measure TRA-1** addresses how CVWD would communicate with emergency response agencies to develop emergency access strategies. Long-term, the Approved Project would not physically impair or otherwise interfere with emergency response or evacuation in the project vicinity as the majority of the project components would be located below-grade and ground surfaces would be returned to pre-construction conditions. Thus, impacts would be less than significant with mitigation incorporated.

Modified Project

Similar to the Approved Project, the Modified Project would also require temporary lane closures during construction. Implementation of **Mitigation Measure TRA-1** would require CVWD to develop a Traffic Control Plan, which would reduce conflict between project construction activities and emergency services (police, fire, and others) by requiring identification of roadways and access points for emergency services and requiring that disruptions to or closures of these locations be minimized. All surfaces would be returned to pre-construction conditions after excavation, and implementation of the Modified Project would not add any additional vehicle trips for operation and maintenance. Therefore, there would be no new impacts as a result of the Modified Project and no new mitigation would be required.

Mitigation Measures

To mitigate possible impacts to emergency access during construction, CVWD shall implement **Mitigation Measure TRA-1**, which was previously adopted in the MND for the

Approved Project. The Modified Project impacts are the same as the Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

4. CONCLUSIONS

Based on the information provided in *Section 3 Evaluation of Environmental Impacts*, the newly evaluated impacts of the Modified Project would not substantially alter impacts previously identified in the MND for the Approved Project. **Mitigation Measures BIO-1, BIO-2, BIO-3, CUL-1, CUL-2, CUL-3, HAZ-1, NOI-1, and TRA-1** included in the MND would also apply to the Modified Project as identified in this Addendum and would reduce impacts of the Modified Project to less-than-significant levels. Therefore, the conclusions of this Addendum remain consistent with those made in the MND. No new significant impacts have been identified, nor is the severity of newly identified impacts substantially greater than impacts identified in the MND. No additional CEQA review is required.

5. FEDERAL CROSS-CUTTING ENVIRONMENTAL REGULATION EVALUATION

The Modified Project, as a part of the Approved Project, may receive funding from a federal program and/or a state program that also has a federal funding component. Therefore, to assist in compliance with the federal environmental requirements for the funding program, this Addendum includes analyses pertinent to several federal cross-cutting regulations (also referred to as federal cross-cutters, CEQA-Plus, or Tier 2). The basic rules for complying with cross-cutting federal authorities are set out in the State Water Resources Control Board (SWRCB) Clean Water State Revolving Fund (CWSRF) regulations at 40 CFR §35.3145 and the United States Department of Agriculture (USDA) Environmental Policies and Procedures at 7 CFR §1970.

This section describes the status of compliance with relevant federal laws, executive orders, and policies, and the consultation that has occurred or will occur in the near future. The topics are based on the USDA environmental policies and procedures and the SWRCB's CWSRF Program Federal Cross-cutting Environmental Regulations Evaluation Form for Environmental Review and Federal Coordination. The CWSRF Program is partially funded by the United States Environmental Protection Agency (US EPA). Therefore, the SWRCB must document that projects meet the federal cross-cutter requirements.

Federal Endangered Species Act

As described in the Biological Resources section, the biological resources assessment of the Modified Project relies on two technical reports prepared by Rincon Consultants, Inc: a 2021 Biological Resources Technical Study prepared for the Airport Boulevard Sewer Consolidation Project MND (**Appendix B**), and a 2024 Biological Resources Report that was prepared for the 3,000 linear feet water main extension on Avenue 57 from Oscar Cruz Water System to Pierce Street (**Appendix C**).

Although no special status wildlife species were recorded or observed during the records searches and field surveys conducted as part of the 2021 Biological Resources Technical Study or 2024 Biological Resources Report, there is habitat within and adjacent to the Modified Project area that is suitable for nesting birds. With the implementation of **Mitigation Measure BIO-3** from the MND, which requires pre-construction nesting bird clearance surveys if construction activities occur during the nesting season, the Modified Project would have no effect to the federally-protected species under the Federal Endangered Species Act. The Modified Project would not jeopardize any listed species and the lead agency would be in compliance with the Federal Endangered Species Act.

National Historic Preservation Act

As described in the Cultural Resources section, the cultural resources assessment of the Modified Project relies on two technical reports prepared by Rincon Consultants, Inc: a 2021 Cultural Resources Technical Report prepared for the Airport Boulevard Sewer Consolidation Project MND (**Appendix D**), and a 2024 Historic Property Inventory Report

that was prepared for the 3,000 linear feet water main extension on Avenue 57 from Oscar Cruz Water System to Pierce Street (**Appendix E**).

With the implementation of **Mitigation Measures CUL-1, CUL-2, and CUL-3** from the MND, which require observation by an archaeological and Native American monitor during ground disturbing activities; halting work if a resource is found until it can be evaluated; and appropriately handling resources, if discovered, the Modified Project would not significantly impact cultural resources and would be in compliance with the National Historic Preservation Act. No new impact would occur as a result of the Modified Project, and no new mitigation would be required.

Pipeline within Avenue 57 would be installed within the existing right-of-way, and new on-property distribution piping, if needed, would be installed in the same location as existing distribution piping, where possible, and would have no impact to existing structures. Therefore, no effects to historic properties under the National Historic Preservation Act for the Modified Project would be expected.

Archaeological and Historic Preservation Act

With the implementation of **Mitigation Measures CUL-1, CUL-2, and CUL-3** from the MND, which require observation by an archaeological and Native American monitor during ground disturbing activities; halting work if a resource is found until it can be evaluated; and appropriately handling resources, if discovered, the Modified Project would not significantly impact cultural resources and thus would be in compliance the Archaeological and Historic Preservation Act. No new impact would occur as a result of the Modified Project, and no new mitigation would be required. The Modified Project is expected to result in no effects to scientific, prehistoric, historic, and archaeological materials and data under the Archaeological and Historic Preservation Act.

Clean Air Act

As described in *Section 3.3 Air Quality*, the Modified Project is in the Coachella Valley portion of the SSAB, which is in federal non-attainment status for O₃ and PM₁₀ (SCAQMD 2022). **Table 5-1** summarizes the Leon Housing MHP Project's total annual construction emissions, adds the total annual construction emissions from the Approved Project, and compares those to the applicable de minimis threshold for the SSAB region. As shown in **Table 5-1**, the Leon Housing MHP Project and Approved Project combined criteria air pollutant emissions would not exceed the applicable de minimis thresholds. Therefore, the general conformity requirements do not apply to these emissions and the Modified Project is exempt from a conformity determination.

Table 5-1: Combined Valley View MHP, Phase III A-2 Pipeline, and Leon Housing MHP Annual Project Emissions Compared to De Minimum Thresholds (tons/year)

Emissions Source	NO _x	VOC	PM ₁₀
Phase III A-2 annual construction emissions	0.4	0.04	0.03
Valley View MHP annual construction emissions	2.8	0.31	0.24
Leon Housing MHP annual construction emissions	1.48	0.17	0.09
Combined annual construction emissions	4.68	0.52	0.36
<i>De Minimis Threshold</i>	25	25	70
Threshold exceeded?	No	No	No
Notes: The SSAB is non-attainment for O ₃ , however thresholds are set for NO _x (oxides of nitrogen) and ROG (reactive organic gases)/VOC (volatile organic compounds) because these pollutants are ozone precursors, which chemically react in the presence of sunlight to form ground-level ozone. For the purposes of this analysis, the terms ROG and VOC are used interchangeably. Sources: USEPA 2017; SCAQMD 2017.			

The results of the air quality modeling show that pollutant emissions would not exceed federal General Conformity de minimis thresholds. Accordingly, the lead agency would be in compliance with the CAA.

Coastal Zone Management Act

As described in the Hydrology and Water Quality section, the Modified Project area is located approximately 80 miles east of the Pacific Coast. Therefore, no portion of the Modified Project is within the coastal zone and the Coastal Zone Management Act does not apply.

Farmland Protection Policy Act

As described in the Agriculture and Forestry Resources section, agricultural land adjacent to the Modified Project is classified as Prime Farmland and Farmland of Local Importance (**Figure 3-1**) and there are no Williamson Act contracted protected farm lands within the Modified Project area (**Figure 3-2**). Similar to the Approved Project, the Modified Project would be constructed within existing roadways and small water systems properties, and disturbed surfaces would be restored to pre-construction conditions. The Modified Project would not result in land use changes and would therefore not impact important farmland, conflict with agricultural zoning regulations, or result in other changes that would indirectly result in conversion of nearby farmland to non-agricultural use. No new impact would occur as a result of the Modified Project and no new mitigation would be required. The Modified Project is expected to result in no effects to farmland areas and the lead agency would be in compliance with the Farmland Protection Policy Act.

Executive Order 11988 – Floodplain Management, as amended by Executive Orders 12148 and 13690

As described in the Hydrology and Water Quality section, the Modified Project area is not located within or adjacent to a FEMA 100 or 500-year flood zone (**Figure 3-5**). Similar to the Approved Project, the Modified Project would be constructed entirely within existing

roadways and small water systems properties. Therefore, no changes in type or severity of impacts are anticipated. The Modified Project would have no effect on flood zones and would be in compliance with Executive Order 11988.

Federal Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, and Executive Order 13168

As described in the Biological Resources section, the biological resources assessment of the Modified Project relies on two technical reports prepared by Rincon Consultants, Inc: a 2021 Biological Resources Technical Study prepared for the Airport Boulevard Sewer Consolidation Project MND (**Appendix B**), and a 2024 Biological Resources Report that was prepared for the 3,000 linear feet water main extension on Avenue 57 from Oscar Cruz Water System to Pierce Street (**Appendix C**).

Records searches and field surveys conducted as part of the 2021 Biological Resources Technical Study or 2024 Biological Resources Report concluded that nesting habitat adjacent to the Modified Project alignment may be suitable for bird species common in the area, and nesting birds are likely to be present during the nesting season. If construction cannot be avoided during nesting season, implementation of **Mitigation Measure BIO-3** from the MND would reduce potential impacts on nesting birds. No new impact would occur as a result of the Modified Project, and no new mitigation would be required. Thus, there would be no effect and the lead agency would be in compliance with the Federal Migratory Birds Treaty Act, Bald and Golden Eagle Protection Act, and Executive Order 13168.

Fish and Wildlife Coordination Act

The Modified Project would not impound, divert, or control a surface water source. Operation of the Modified Project would not substantially decrease groundwater supplies or interfere with groundwater recharge such that there would be an effect on fish and wildlife resources. Therefore, the Modified Project would not conflict with the Fish and Wildlife Coordination Act.

Executive Order 11990 – Protection of Wetlands

As described in the Biological Resources section, the Modified Project area does not support federally protected wetlands as defined by Clean Water Act Section 404 and no waters or wetlands potentially subject to the jurisdiction of the USACE, RWQCB, or CDFW are located within the Modified Project area. Therefore, there would be no impact to wetlands and the lead agency would be in compliance with Executive Order 11990.

Executive Order 13112 – Invasive Species

The Modified Project would implement construction BMPs that suppress dust and contain sedimentation and runoff from the site (see *Section 2.4.5 Construction Best Management Practices*). In areas where revegetation is required, use of native species would be required, per the project-specific SWPPP, to ensure that introduction of invasive species

does not occur. The lead agency would therefore be in compliance with Executive Order 13112.

Wild and Scenic Rivers Act

There are no designated Wild and Scenic Rivers within the Modified Project area, nor would any designated rivers be affected by the Modified Project. Therefore, the Modified Project would not result in any impacts related to the Wild and Scenic Rivers Act.

Safe Drinking Water Act, Sole Source Aquifer Program

Within US EPA's Region 9, which includes California, there are nine sole source aquifers. None of these sole source aquifers are located within the Modified Project area. Therefore, the Sole Source Aquifer Program does not apply to the Modified Project, and the lead agency would be in compliance with Section 1424(e) of the Safe Drinking Water Act.

Executive Order 13195 – Trails for America in the 21st Century

The Modified Project would have no effect on trails and the lead agency would be in compliance with Executive Order 13195.

Executive Order 13007 – Indian Sacred Sites

As described in the Tribal Cultural Resources section, the assessment of the Modified Project relies on two technical reports prepared by Rincon Consultants, Inc: a 2021 Cultural Resources Technical Report prepared for the Airport Boulevard Sewer Consolidation Project MND (**Appendix D**), and a 2024 Historic Property Inventory Report that was prepared for the 3,000 linear feet water main extension on Avenue 57 from Oscar Cruz Water System to Pierce Street (**Appendix E**).

Results from the records searches conducted as part of the 2021 Cultural Resources Technical Report and 2024 Historic Property Inventory Report found that no recorded tribal cultural resources have been identified within the Modified Project alignment. However, although no Indian sacred sites were identified that would be directly impacted, two tribes indicated the presence of a village in the vicinity of the Airport Boulevard Sewer Consolidation Project APE, located approximately 1.25 miles west of the APE (CA-RIV-148). Although the village site is outside of the Modified Project area, the use-area of the village likely spans several square miles. While the Modified Project would only disturb a limited area, there remains a possibility that previously unknown cultural resources could be encountered during construction. With the implementation of **Mitigation Measures CUL-1, CUL-2, and CUL-3** from the MND, the Modified Project would have a less than significant impact on tribal cultural resources. No new impact would occur as a result of the Modified Project, and no new mitigation would be required. The lead agency would be in compliance with Executive Order 13007.

Magnuson-Stevens Fishery Conservation and Management Act

The Modified Project would not be located in or impact any U.S. federal waters regulated under the Magnuson-Stevens Act. Therefore, the Modified Project would have no impact on resident or migratory fish or fish habitat and the lead agency would be in compliance with the Magnuson-Stevens Act.

Rivers and Harbors Act, Section 10

The Modified Project area does not include a water body that is considered a Traditionally Navigable Water by the USACE and construction of the Modified Project would not require a Section 10 permit. Therefore, the Modified Project would have no impact and the lead agency would be in compliance with the Rivers and Harbors Act.

Wilderness Act

The Modified Project is not located within a designated wilderness area. Similar to the Approved Project, the effects of the Modified Project would be limited to the immediate Modified Project vicinity and would not extend to wilderness areas or federally managed lands. Therefore, the Modified Project would have no effect on wilderness areas and the lead agency would be in compliance with the Wilderness Act.

Environmental Justice

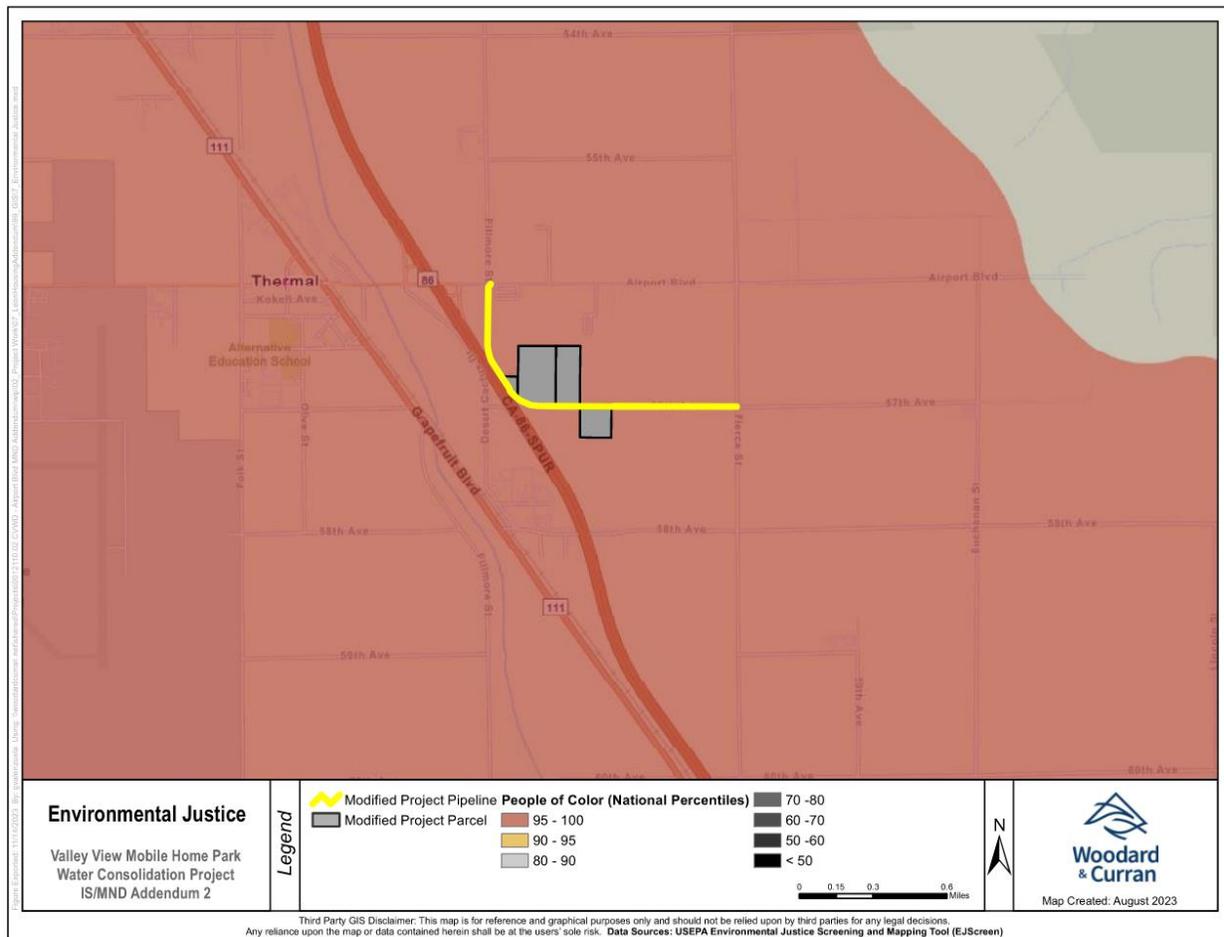
This section describes the existing socioeconomic resources in the Modified Project area and the regulatory setting pertaining to environmental justice-related issues. This section also evaluates the potential for the Modified Project to disproportionately affect minority or low-income groups. The US EPA defines environmental justice as:

“The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means no group of people, including racial, ethnic, or economic groups should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs, and policies (US EPA 2022)”.

According to US EPA guidelines, a minority population is present in a study area if the minority population of the affected area exceeds 50 percent, or if the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis.

The Modified Project would be located within the unincorporated community of Thermal in unincorporated Riverside County. According to the US EPA’s Environmental Screening and Mapping Tool (US EPA 2023), the entire Modified Project area is within the 95-100 percentile for minority population (**Figure 5-1**). Therefore, similar to the Approved Project, the Modified Project area is composed of a minority population exceeding 50 percent.

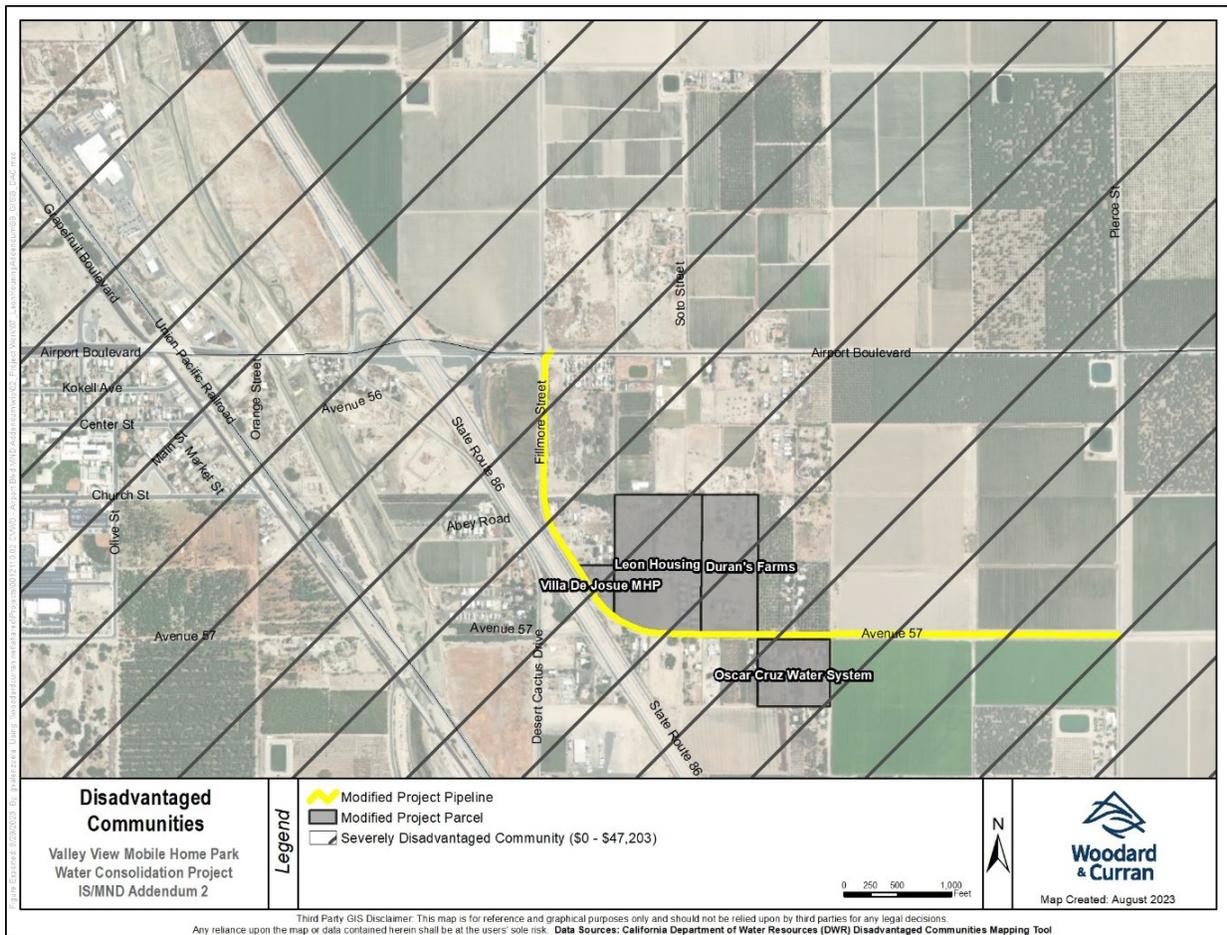
Figure 5-1: US EPA EJScreen Map of Minority Population



US EPA guidelines recommend that analyses of low-income communities consider the US Census Bureau’s poverty level definitions, as well as applicable State and regional definitions of low-income and poverty communities. According to the 2017 to 2021 American Community Survey 5-Year Estimates, 40.2 percent of people in Thermal are considered to be in poverty (US Census Bureau 2021a). In comparison, the percentage of persons in poverty for the entire State of California was 12.3 percent for the same time period (US Census Bureau 2021b).

The California Department of Water Resources (DWR) defines a disadvantaged community (DAC) as a community with a median household income (MHI) less than 80 percent of the California MHI, and a Severely Disadvantaged Community (SDAC) as a community with an MHI less than 60 percent of the California MHI. To identify the location of DAC and SDAC communities for its mapping tool, DWR (DWR n.d.), relies on 2016-2020 American Community Survey data, which defines the Statewide MHI as \$78,672. A DAC would therefore be a community with an MHI of \$62,938 or less and an SDAC would be a community with an MHI of \$47,203 or less. According to the DWR Mapping Tool as shown in **Figure 5-2**, the entire Modified Project area is located within a SDAC.

Figure 5-2: DWR DAC Mapping Tool



Impact Analysis

For the purposes of this analysis, an environmental justice impact would be significant if the Modified Project would directly, indirectly, or cumulatively cause disproportionately high and adverse impacts to minority or low-income populations. High and adverse impacts are considered those that are found to be significant environmental impacts in this Addendum (when compared to relevant thresholds of significance for a given resource). As described in *Section 3 Evaluation of Environmental Impacts*, all potential impacts of the Modified Project would be mitigated to less than significant.

Similar to the Approved Project, construction of the Modified Project would result in temporary impacts (e.g., dust, traffic, and noise) that would cease upon completion of construction. Where potential impacts would occur, previously adopted mitigation measures from the MND would be implemented to reduce such effects to less-than-significant levels. Once operational, the Modified Project would consist of below-ground pipelines that would not create any permanent impact. Therefore, the Modified Project

would not result in any disproportionately high adverse impacts on minority or low-income communities and no environmental justice impacts would occur.

6. ALTERNATIVES ANALYSIS

This project may receive federal funding through the SWRCB. The following environmental alternatives analysis has been prepared to comply with the Environmental Package component of the Financial Assistance Application. This analysis addresses the following elements:

- Range of feasible project alternatives that each meet the applicant’s project needs and objectives, as well as a “no project/no action” alternative;
- Comparative environmental analysis among the project alternatives that includes discussions of beneficial and adverse environmental impacts on the existing environment, future environment, and individual sensitive environmental issues identified through project management or public participation;
- Analysis of direct, indirect, and cumulative impacts on sensitive environmental resources;
- Potential reasonably foreseeable future environmental impacts;
- Appropriate mitigation measures not already included in the proposed action or alternatives, if appropriate, to mitigate adverse environmental impacts; and
- Thorough discussions of the environmental reasoning for selection of the chosen alternative for the project.

6.1 Alternative Evaluated

In response to direction provided by the California SWRCB, one environmental alternative is analyzed herein: the No Project/No Action alternative. The Valley View MHP MND and the Preliminary Engineering Report for the Valley View Mobile Home Park (Woodard & Curran 2020) include a comparative analysis of the environmental impacts of the project alternatives. Under the No Project/No Action alternative evaluated in the Valley View MHP MND, the nine Valley View Mobile Home Park SWSs would not be consolidated into the CVWD potable water system. Under the No Project/No Action alternative in this analysis, the 4 SWSs within the Modified Project would not be consolidated into the CVWD potable water system, and the SWSs serving the individual MHPs homes would continue to operate under current conditions. Water would continue to be supplied through private onsite wells, distributed with existing onsite pipeline networks, and treated through individual onsite systems. The No Project/No Action alternative would not provide a safer, more reliable water supply to existing communities.

Table 6-1 provides a comparison between the potential environmental impacts of the Modified Project and the No Project/No Action alternative with regard to the resource topics addressed in State CEQA Appendix G, Environmental Checklist, as well as the applicable federal cross-cutters.

6.2 Selected Alternative

The No Project/No Action alternative would not achieve the project objectives to improve the reliability, safety and security of the water supply for rural disadvantaged communities in the East Coachella Valley. The Modified Project is the recommended alternative because it is cost-effective, serves the greatest demand, and achieves other project objectives for drinking water compliance reliability.

Table 6-1 presents a summary of the environmental impacts of the Modified Project, the Modified Project with mitigation incorporated (if applicable), and the No Project/No Action alternative. **Table 6-1** summarizes the impacts as either No impact, Less than Significant Impact; Potentially Significant Impact; or Not Applicable (N/A).

Table 6-1: Comparison of Alternatives – Environmental Impacts

Issue Areas	Modified Project		Alternative
	Addendum 2 Findings	With Mitigation	No Project/ No Action
Aesthetics			
Scenic vistas; Visual character and quality; Light and glare	Less than Significant Impact	N/A	No impact
Scenic resources along a State Scenic Highway	No impact	N/A	No impact
<p>The Modified Project involves the construction of underground pipelines, which would not be visible after the completion of construction. There are no scenic highways in the Modified Project area. Construction would occur primarily during daytime hours and any lighting necessary for construction would be directed towards installation activities and away from adjacent land uses. During construction, aesthetics would be temporarily impaired by construction equipment; however, once construction is complete, the Modified Project would not be visible and would not result in permanent changes to scenic vistas, visual quality, or light and glare.</p> <p>No Project/ No Action alternative would not involve construction of new structures that would impede views, change visual character, or add new substantial sources of light, and thus would not result in aesthetic impacts.</p>			
Agriculture and Forestry			
Convert farmland; Conflict with zoning for agricultural use; Indirect conversion of farmland	Less than Significant Impact	N/A	No impact
Conflict with zoning for forest use; Loss of forest use	No impact	N/A	No impact
<p>The Modified Project would construct pipelines within existing roadways and some privately-owned properties, with connections to existing small water systems, including onsite improvements on privately owned properties, and would not result in conversion of farmland or loss of forest land.</p> <p>The No Project/No Action alternative would involve no construction and therefore would not have the potential to impact agriculture and forestry resources.</p>			
Air Quality			
Consistency with AQMP; Non-attainment criteria pollutants; Sensitive receptors	Less than Significant Impact	N/A	No impact
Objectionable odors	Less than Significant Impact	N/A	No impact

Issue Areas	Modified Project		Alternative
	Addendum 2 Findings	With Mitigation	No Project/ No Action
<p>The Modified Project involves connecting small water systems that serve existing communities to provide them with a safer, more reliable supply of potable water. The Modified Project would serve existing communities and would not lead to unplanned population, housing, or employment growth and thus would not conflict with the forecasts used in the development of the South Coast Air Quality Management District (SCAQMD) <i>Air Quality Management Plan</i> (AQMP). Assuming 100 linear feet of pipeline would be constructed each day, Modified Project construction emissions would not exceed regional or localized significance thresholds. The Modified Project would not generate substantial operational emissions and emissions would not exceed the SCAQMD thresholds for any criteria pollutants. The Modified Project would result in a minor increase in motor vehicle trips associated with maintenance; however, intermittent trips from a single vehicle would not generate emissions exceeding regional thresholds for operation. Construction-related odors from diesel equipment would be temporary and, once operational, the Modified Project would not create objectionable odors.</p> <p>The No Project/ No Action alternative would not generate any construction emissions and would not result in any changes to operational emissions.</p>			
Biological Resources			
Sensitive species	Potentially Significant Impact	Less than Significant Impact	No Impact
Sensitive habitat; Wetlands; Wildlife corridors;	Less than Significant Impact	N/A	No Impact
Local policies and ordinances	No Impact	N/A	No Impact
Habitat Conservation Plans or Natural Community Conservation Plans	No Impact	N/A	No Impact
<p>The Modified Project area does not contain suitable habitat for any special status species; however, it provides general nesting bird, burrowing owl, and roosting bat habitat. Implementation of mitigation measures would reduce potential construction impacts on birds protected under the MBTA and FGC 3503 and 3503.5 and CDFW special-status species to less than significant. The Modified Project does not have the potential to impact sensitive vegetation communities or wildlife corridors because construction would occur in developed urban and agricultural areas. The Modified Project is near the Coachella Valley Stormwater Channel, a jurisdictional water, but the implementation of BMPs would help minimize impacts. The Modified Project would not conflict with the <i>Coachella Valley Multiple Species Habitat Conservation Plan</i> (CVMSHCP) because the Modified Project is located within the CVMSHCP planning area boundary but is not within any specific Conservation areas of the CVMSHCP.</p> <p>The No Project/No Action alternative would involve no construction and therefore would not have the potential to result in impacts on nesting or migratory birds, burrowing owls, roosting bats, or other biological resources.</p>			
Cultural Resources			
Historical resources; Archaeological resources	Potentially Significant Impact	Less than Significant Impact	No impact
Human remains	Potentially Significant Impact	Less than Significant Impact	No impact

Issue Areas	Modified Project		Alternative
	Addendum 2 Findings	With Mitigation	No Project/ No Action
<p>Records searches and pedestrian surveys were conducted for the Modified Project area in a Cultural Resources Technical Report that was prepared in April 2021 and a Historic Property Inventory Report that was prepared in October 2023 by Rincon Consultants, Inc. Although no historic properties or cultural resources were identified within the Modified Project alignment, there is a possibility of identifying unanticipated cultural resources during ground disturbing activities associated with construction of the Modified Project. Implementation of cultural resource mitigation measures would reduce potential impacts to less than significant. Similarly the potential for encountering human remains is low; however, additional mitigation measures would ensure less than significant impacts.</p> <p>The No Project/No Action alternative would not involve construction and therefore would not have the potential to disturb previously unknown cultural resources or human remains.</p>			
Energy			
Wasteful, inefficient or unnecessary consumption of energy resources	Less than Significant Impact	N/A	No impact
Conflict with state or local plans for renewable energy or energy efficiency	Less than Significant Impact	N/A	No impact
<p>Construction of the Modified Project would comply with required energy efficiency measures and operational energy use would offset energy currently used to pump and treat water at existing small water systems. Impacts associated with energy consumption would thus be less than significant. By consolidating existing water systems, the Modified Project would reduce energy demand by improving coordination and management of water supplies. The Modified Project would thus not conflict with state or local plans for energy efficiency and impacts would be less than significant.</p> <p>The No Project/No Action alternative would not use energy for construction, and operational energy use would remain the same as under existing conditions.</p>			
Geology and Soils			
Geological hazards; Erosion and topsoil loss; Unstable soils; Expansive soils	Less than Significant Impact	N/A	No impact
Alternative wastewater disposal systems	No impact	N/A	No impact
Paleontological Resources	Less than Significant Impact	N/A	No impact

Issue Areas	Modified Project		Alternative
	Addendum 2 Findings	With Mitigation	No Project/ No Action
<p>The Modified Project involves construction of pipelines to consolidate water systems and thus would not involve exposure of people or structures to seismically induced risk. The Modified Project would minimize soil erosion via implementation of BMPs in a SWPPP prepared in accordance with the SWRCB’s Construction General Permit. Compliance with CVWD’s professional engineering standards would ensure less than significant impacts related to risks of unstable soils or geologic hazards. The Modified Project is not located on expansive soils, nor would it involve the use of septic tanks or alternative wastewater disposal systems. The potential for encountering fossil resources is low because ground disturbing activities would only reach a depth of six feet below ground surface and pipelines would be constructed primarily within roadway rights of way and other public and private lands that are already disturbed; significant impacts to paleontological resources are thus not expected.</p> <p>The No Project/No Action Alternative would involve no construction and thus is not expected to result in impacts related to geologic hazards, septic systems or paleontological resources.</p>			
Greenhouse Gas (GHG) Emissions			
GHG emissions	Less than Significant Impact	N/A	No Impact
Conflict with GHG reduction plans	Less than Significant Impact	N/A	Less than Significant Impact
<p>The Modified Project’s maximum annual GHG emissions (including amortized construction emissions) would be less than the Approved Project emissions and would not exceed SCAQMD’s recommended annual threshold for CO₂e emissions. GHG emissions of the Modified Project would be less than significant. The Modified Project would support statewide GHG reduction plans that call for improved coordination and management of various water supplies.</p> <p>The No Project/No Action alternative would not involve construction, and GHG impacts of operation would not change from the existing condition. The No Project/No Action alternative would not support applicable GHG reduction plans because it would not improve coordination and management of water supplies; however, the size of the No Project/No Action alternative would not be significant.</p>			
Hazards and Hazardous Materials			
Routine handling of hazardous materials; Listed hazardous materials sites; Airport safety hazard; Wildland fire	Less than Significant Impact	N/A	No impact
Accidental release of hazardous materials;	Potentially Significant Impact	Less than Significant Impact	No impact
Emergency response or evacuation plans conflict	Potentially Significant Impact	Less than Significant Impact	No impact
Hazardous materials near schools	No impact	N/A	No impact
<p>Construction of the Modified Project would temporarily increase the routine transport and use of hazardous materials, but transport and use of hazardous materials would not be needed for pipeline operation. There are no active hazardous materials sites in the Modified Project area. The proposed pipelines would extend into the Jacqueline Cochran Regional Airport influence area as defined in the Airport Land Use Plan but would not cause an airport safety hazard. There are no private airstrips in the Modified Project area. The Modified Project area is not a Very High Fire Hazard Severity Zone, and standard fire safety practices would be used during construction. These hazards are thus expected to be less than significant. There is a risk of accidental hazardous materials release during construction. Mitigation requiring a Hazardous Materials</p>			

Issue Areas	Modified Project		Alternative
	Addendum 2 Findings	With Mitigation	No Project/ No Action
<p>Management and Spill Control Plan would reduce impacts to less than significant. Temporary traffic lane closures during construction could impede emergency response; mitigation to require a Traffic Control Plan would reduce impacts to less than significant. There are no schools present near the Modified Project alignment.</p> <p>The No Project/No Action alternative would involve no construction and would thus have no impacts associated with hazardous materials or other hazards.</p>			
Hydrology and Water Quality			
Water quality standards or otherwise degrade water quality	Less than Significant Impact	N/A	No impact
Groundwater supply and recharge	Less than Significant Impact	N/A	No impact
Drainage alterations that cause erosion/sedimentation; flooding; exceed capacity of stormwater system; redirect or impede flood flows;	Less than Significant Impact	N/A	No impact
In flood hazard, tsunami, or seiche zones risk release of pollutants	Less than Significant Impact	N/A	No impact
Conflict with or obstruct water quality control plan or sustainable groundwater management plan	Less than Significant Impact	N/A	No impact
<p>Excavation, grading, and other activities associated with construction of the Modified Project would result in soil disturbance that would cause water quality violations through potential erosion and subsequent sedimentation of receiving water bodies. However, compliance with the SWRCB's Construction General Permit, including implementation of BMPs outlined in a SWPPP, would result in less than significant impacts to water quality. The Modified Project would connect small water systems to the CVWD potable water system, but would not alter the amount of groundwater use because both the small water systems and CVWD water system pump groundwater from the Coachella Valley Groundwater Basin. Disturbance of drainage patterns and runoff to the stormwater drainage system would be temporary and less than significant. The Modified Project would not have an impact related to flooding risks, or seiche, tsunami, or mudflows due to location away from the sources of such threats.</p> <p>The No Project/No Action alternative would not involve construction of new facilities so would not have construction or operational impacts on water quality or drainage patterns, and there would be no impact related to flooding risks, or seiche, tsunami, or mudflows.</p>			
Land Use and Planning			
Divide an established community;	No impact	N/A	No impact
Conflict with an applicable land use plan	No impact	N/A	No impact
<p>The Modified Project would not divide an established community and would not result in a land use change, so it would not conflict with any applicable plan, policy or regulation with jurisdiction over the project.</p> <p>The No Project/No Action alternative would not divide an established community and would not change land use; thus, no impact would occur.</p>			
Mineral Resources			

Issue Areas	Modified Project		Alternative
	Addendum 2 Findings	With Mitigation	No Project/ No Action
Loss of availability of a known, valuable mineral resource or mineral resource recovery site	No impact	N/A	No impact
There are no known mineral resources or mineral recovery sites in the vicinity of the Modified Project corridor, therefore no impact would occur.			
There would be no impacts from the No Project/No Action alternative.			
Noise			
Excessive noise; Permanent increase in noise levels; Temporary increase in noise levels; Ground-borne vibration	Potentially Significant Impact	Less than Significant Impact	No impact
Aircraft noise	Less than Significant Impact	N/A	No impact
Construction noise from the Modified Project would be temporary and exposure of any single receptor would be limited to a few days at most. Although construction noise associated with capital improvement projects of a governmental agency are exempt from the Riverside County noise ordinance, construction noise and vibration impacts on residents are considered potentially significant, so noise mitigation measures would be implemented to ensure that impacts are less than significant. The Modified Project would serve existing communities and would thus not expose new residents or workers to noise. Operation of the Modified Project would not generate perceptible noise.			
The No Project/No Action alternative would not entail construction of new facilities and would thus have no temporary or permanent noise impacts.			
Population and Housing			
Population growth	Less than Significant Impact	N/A	No impact
Displacement of housing or people	No impact	N/A	No impact
The Modified Project would not directly induce population growth, as it would serve the existing communities that currently rely on the SWSs. Additionally, the proposed expansion of the CVWD potable system, and subsequent indirect growth, is consistent with planned growth in the area and would not displace housing or people. Groundwater would continue to be supplied from the same groundwater basin.			
The No Project/No Action alternative would not include new facilities and would not induce population growth that would displace housing or people.			
Public Services / Recreation			
Fire protection services; Police protection services	No impact	N/A	No impact
Schools; Other services-libraries	No impact	N/A	No impact
Recreational facilities	No impact	N/A	No impact
The Modified Project would not require additional or unusual fire or police protection resources or change existing demand for public services. It does not propose new recreational facilities that would impact the environment. There would be no impacts to public services or recreation associated with the Modified project.			
There would be no impacts from the No Project/No Action alternative.			

Issue Areas	Modified Project		Alternative
	Addendum 2 Findings	With Mitigation	No Project/ No Action
Transportation and Traffic			
Circulation system performance; Emergency access	Potentially Significant Impact	Less than Significant Impact	No impact
Consistency with CEQA Guidelines section 15064.3 subdivision (b) (VMT); Traffic hazards	No impact	N/A	No impact
<p>Construction would require lane closures for pipeline construction, and would generate only minimal vehicle trips for construction workers. To ensure that potential traffic impacts are less than significant, the Modified Project would implement transportation mitigation measures, including notifying emergency service providers and schools, implementing a Traffic Control Plan, and avoiding high volume intersections. Once constructed, the buried pipelines would not result in traffic hazards.</p> <p>The No Project/ No Action alternative involves no construction and would not impact traffic circulation, emergency access, VMT, alternative transportation facilities, or create traffic hazards.</p>			
Tribal Cultural Resources			
Tribal cultural resources	Potentially Significant Impact	Less than Significant Impact	No impact
<p>As part of the MND analysis, which Addendum 2 for the Modified Project is tiered from, CVWD consulted with several California Native American tribes pursuant to AB 52. Although no tribal cultural resources have been identified in the Modified Project area, consultation with two tribes indicate a nearby tribal village and there is the potential for undiscovered resources to be encountered during construction. To reduce the potential impacts on tribal cultural resources, the Modified Project would implement mitigation in the event of an unanticipated discovery of cultural resources, tribal or otherwise, during project construction. Doing so would reduce impacts to less than significant.</p> <p>The No Project/ No Action Alternative would not impact tribal cultural resources because it would not involve ground-disturbing activities.</p>			
Utilities and Service Systems			
Construction of new utilities causing environmental effects	Less than Significant Impact	N/A	No impact
Sufficient water supply	Less than Significant Impact	N/A	No impact
Wastewater treatment capacity	No impact	N/A	No impact
Solid waste capacity; Solid waste compliance	Less than Significant Impact	N/A	No impact
<p>The Modified Project includes new water lines but construction would not have significant environmental effects; no new wastewater, stormwater, power, or telecommunications facilities would be required. CVWD has determined that it has sufficient water supplies to serve the new service connections associated with the Modified Project. The Modified Project would not require wastewater treatment capacity. Construction would generate a minimal amount of excess soils that would be reused onsite to the extent feasible; there would be no long-term solid waste generated by the Modified Project so impacts would be less than significant.</p> <p>The No Project/ No Action alternative would not include construction of any facilities and would have no additional demands for water, wastewater or solid waste facilities.</p>			

Issue Areas	Modified Project		Alternative
	Addendum 2 Findings	With Mitigation	No Project/ No Action
Wildfire			
Impair an adopted emergency response or evacuation plan	Potentially Significant Impact	Less than Significant Impact	No Impact
Exacerbate wildfire risk due to required installation or maintenance of associated infrastructure	No impact	N/A	No impact
Exacerbate wildlife risk due to slope prevailing winds, or other factors	No Impact	N/A	No Impact
Expose people or structures to risks from runoff, post-fire slope instability or drainage changes.	No Impact	N/A	No Impact
<p>The Modified Project area is not in a Very High Fire Hazard Severity Zone, and standard fire safety practices would be used during construction. Thus, no impacts are expected related to exacerbation of wildfire risk. Temporary traffic lane closures during construction would impede emergency response; mitigation to require a Traffic Control Plan would reduce impacts to less than significant.</p> <p>The No Project/No Action alternative would involve no construction, and would thus have no impacts associated with exacerbation of wildfire risk and would not impact emergency response or evacuation plans.</p>			
Federal Cross-Cutters			
Federal Endangered Species Act	Comply	Comply	No Impact
<p>The Modified Project site does not contain suitable habitat for any special status plant or most wildlife species. All trenching would occur within paved or previously disturbed areas; therefore, the Modified Project is not expected to result in direct or indirect impacts on special-status plant species. Mitigation would minimize potential impacts on nesting bird, burrowing owl, and roosting bat habitat. The Modified Project would not jeopardize listed species and the SWRCB and/or USDA would be in compliance with the Federal Endangered Species Act (ESA).</p> <p>The No Project/ No Action alternative would involve no construction and thus would not impact sensitive species.</p>			
National Historic Preservation Act, Section 106	Comply	Comply	No impact
<p>Cultural resource assessment of the Modified Project area consists of a Cultural Resources Technical Report that was prepared in April 2021 and a Historic Property Inventory Report that was prepared in October 2023 by Rincon Consultants, Inc. The 2024 Historic Property Inventory Report would be submitted as part of the consultation process with the State Historic Preservation Officer (SHPO). Concurrence by SHPO would ensure compliance with the National Historic Preservation Act (NHPA). The SHPO provided concurrence on the 2021 Cultural Resources Technical Report in the summer of 2022. No cultural resources were identified within the Modified Project area and the Modified Project would implement mitigation measures in the event of unanticipated discovery of cultural resources.</p> <p>The No Project/ No Action alternative would involve no construction and thus would not affect undisturbed soils or historical resources.</p>			

Issue Areas	Modified Project		Alternative
	Addendum 2 Findings	With Mitigation	No Project/ No Action
Archaeological and Historic Preservation Act	Comply	Comply	No impact
<p>Cultural resource records searches were conducted for the Modified Project area in a Cultural Resources Technical Report that was prepared in April 2021 and a Historic Property Inventory Report that was prepared in October 2023 by Rincon Consultants, Inc. The cultural records search did not identify any scientific, prehistoric, historic, or archaeological materials or data within the Modified Project construction area, but there are resources recorded within the Modified Project vicinity. As a result, there is a possibility of identifying unanticipated resources during ground disturbing activities associated with the Modified Project. Implementation of cultural resource mitigation measures would reduce potential impacts to less than significant by ensuring that resources are preserved.</p> <p>The No Project/ No Action alternative would not involve construction and therefore would not have the potential to destroy existing scientific, prehistoric, historic, or archaeological materials or data.</p>			
Clean Air Act	Comply	N/A	No impact
<p>The results of the air quality modeling showed that pollutant emissions would not exceed federal General Conformity <i>de minimis</i> thresholds and impacts were less than significant; the project would be in compliance with the Federal Clean Air Act (CAA).</p> <p>The No Project/ No Action alternative would involve no construction and thus would result in no changes to existing emissions and air quality.</p>			
Coastal Zone Management Act	N/A	N/A	N/A
<p>No portion of the Modified Project nor the No Project/ No Action alternative area are within the coastal zone. Therefore, the Coastal Zone Management Act does not apply.</p>			
Farmland Protection Policy Act	Comply	N/A	No impact
<p>The Modified Project would not be located within land currently under agricultural production and construction would not interfere with existing agricultural operations. The Modified Project would not conflict with State, local, and private programs and policies to protect farmland, and the project would be in compliance with the Farmland Protection Policy Act.</p> <p>The No Project/ No Action alternative would involve no construction and thus would not affect agricultural land or existing agricultural operations.</p>			
Executive Order 11988 – Floodplain Management	Comply	N/A	No impact
<p>The Modified Project pipelines would be located underground and would not interfere with floodplain management or expose people or structures to a significant flooding risk. As such, the project would be in compliance with Executive Order 11988.</p> <p>The No Project/ No Action alternative would involve no construction and thus would not expose people or structures to significant flood-related risk.</p>			
Federal Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, and Executive Order 13168	Comply	Comply	No impact

Issue Areas	Modified Project		Alternative
	Addendum 2 Findings	With Mitigation	No Project/ No Action
<p>The Modified Project would have less than significant impacts on protected birds with implementation of mitigation if construction cannot be avoided during the nesting season.</p> <p>The No Project/ No Action alternative would involve no construction and thus would not affect protected birds.</p>			
Executive Order 11990 – Protection of Wetlands	No impact	N/A	No impact
<p>The Modified Project does not involve construction within federally protected wetlands as defined by Clean Water Act Section 404; therefore, no impacts would occur, and the project would be in compliance with Executive Order 11990.</p> <p>The No Project/ No Action alternative would involve no construction and thus would not impact federally protected wetlands.</p>			
Wild and Scenic Rivers Act	N/A	N/A	N/A
<p>There are no designated Wild and Scenic Rivers within the Modified Project area. Therefore, neither the Modified Project nor the No Project/ No Action alternative would result in an impact.</p>			
Safe Drinking Water Act – Source Water Protection	N/A	N/A	N/A
<p>There are no sole-source aquifers in the Modified Project area. Neither the Modified Project nor the No Project/ No Action alternative would result in an impact.</p>			
Executive Order on Trails for America in the 21st Century	N/A	N/A	N/A
<p>There are no trails in the Modified Project area. Neither the Modified Project nor the No Project/ No Action alternative would result in an impact.</p>			
Executive Order 13007 – Indian Sacred Sites	N/A	N/A	N/A
<p>Neither the Modified Project nor the No Project/ No Action alternative would be located on or impact any federal land that is identified as an Indian sacred site.</p>			
Magnuson-Stevens Fishery Conservation and Management Act	N/A	N/A	N/A
<p>The Modified Project is not located in, nor would it impact any U.S. federal waters regulated under the Magnuson-Stevens Act. The Modified Project is not expected to have an adverse effect on Essential Fish Habitat, migratory fish, wildlife species, or fish habitat in a protected area.</p> <p>The No Project/ No Action alternative would involve no construction and thus would not impact Essential Fish Habitat or waters regulated under the Magnuson-Stevens Act.</p>			
Rivers and Harbors Act Section 10	Comply	N/A	N/A
<p>The Modified Project area does not include a water body that is considered a Traditionally Navigable Water by the USACE and construction of the Modified Project would not require a Section 10 permit.</p> <p>The No Project Alternative would not construct new facilities and therefore would have no impacts.</p>			
Wilderness Act	N/A	N/A	N/A

Issue Areas	Modified Project		Alternative
	Addendum 2 Findings	With Mitigation	No Project/ No Action
<p>The Modified Project is not located in, nor would it impact, any designated wilderness areas. The nearest wilderness area is approximately four miles from the Modified Project location, and project impacts would not extend to the wilderness area.</p> <p>The No Project Alternative would not construct new facilities and therefore would have no impact.</p>			
Environmental Justice	Comply	N/A	Comply/No Benefits
<p>The Modified Project alignment would be located in the community of Thermal, which is in the 95-100 percental for Demographic Index within the EPA Environmental Justice Screening and Mapping Tool. The Demographic Index is based on the average of two socioeconomic indicators: low-income and people of color. The Modified Project would have short-term construction impacts, but would achieve the long-term goal of supplying a safer, more reliable water supply to this disadvantaged community.</p> <p>The No Project/ No Action alternative would have no impacts, but would result in no benefits to the community.</p>			

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APPENDIX A: AIR QUALITY MODELING SHEETS

APPENDIX B: 2021 BIOLOGICAL RESOURCES ASSESSMENT

APPENDIX C: 2024 BIOLOGICAL RESOURCES ASSESSMENT

APPENDIX D: 2021 CULTURAL RESOURCES ASSESSMENT

APPENDIX E: 2024 HISTORIC PROPERTY INVENTORY REPORT
